

EXHIBIT C

SUPERIOR COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JASON BOYCE,)	
)	
Plaintiff,)	
)	
vs.)	Case No.:
)	160630/2017
BRUCE WEBER; JASON KANNER;)	
SOUL ARTIST MANAGEMENT;)	
LITTLE BEAR, INC.,)	
)	
Defendants.)	

DEPOSITION OF DAVID TODD
Los Angeles, California
Tuesday, March 5, 2019

Job: 35522

DAVID TODD

March 05, 2019

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<p>1 SUPERIOR COURT OF THE STATE OF NEW YORK</p> <p>2 COUNTY OF NEW YORK</p> <p>3</p> <p>4 JASON BOYCE,)</p> <p>5 Plaintiff,)</p> <p>6 vs.) Case No.:</p> <p>7) 160630/2017</p> <p>8 BRUCE WEBER; JASON KANNER;)</p> <p>9 SOUL ARTIST MANAGEMENT;)</p> <p>10 LITTLE BEAR, INC.,)</p> <p>11 Defendants.)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19 The deposition of DAVID TODD, taken on</p> <p>20 behalf of the Defendant, at 1901 Avenue of the Stars,</p> <p>21 Suite 1600, Los Angeles, California; commencing</p> <p>22 at 10:08 a.m. and ending at 5:59 p.m., on Tuesday,</p> <p>23 March 5, 2019, before Kathy Mannlein, a Certified</p> <p>24 Shorthand Reporter in the State of California,</p> <p>25 License No. 13153.</p>	<p>1 APPEARANCES (Continued)</p> <p>2 For the Witness David Todd:</p> <p>3 LAW OFFICES OF KING, HOLMES, PATERNO & SORIANO, LLP</p> <p>4 BY: STEPHEN D. ROTHSCHILD, Attorney at Law</p> <p>5 1900 Avenue of the Stars, 25th Floor</p> <p>6 Los Angeles, California 90067</p> <p>7 310-282-8986</p> <p>8 310-282-8989 Fax</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19 Also present: David Kim, Videographer</p> <p>20 Jonathan Bernstein</p> <p>21 Aric Fudali</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 APPEARANCES OF COUNSEL:</p> <p>2 For the Plaintiff:</p> <p>3 THE BLOOM FIRM</p> <p>4 BY: ANNA LEVINE-GRONNINGSATER, Attorney at Law</p> <p>5 BY: SARAH BLOOM, Attorney at Law</p> <p>6 20700 Ventura Boulevard, Suite 301</p> <p>7 Woodland Hills, California 913640</p> <p>8 818-914-7397</p> <p>9 818-884-8079 Fax</p> <p>10 Anna@TheBloomFirm.com</p> <p>11</p> <p>12 For the Defendant Bruce Weber and Little Bear, Inc.:</p> <p>13 NELSON MULLINS BROAD AND CASEL</p> <p>14 BY: JONATHAN ETRA, Attorney at Law</p> <p>15 2 South Biscayne Boulevard, 21st Floor</p> <p>16 Miami, Florida 33131</p> <p>17 305-373-9447</p> <p>18 jonathan.etra@nelsonmullins.com</p> <p>19 SALE & WEINTRAUB, P.A.</p> <p>20 BY: JAYNE C. WEINTRAUB, Attorney at Law</p> <p>21 2 South Biscayne Boulevard, 21st Floor</p> <p>22 Miami, Florida 33131</p> <p>23 305-374-1818</p> <p>24 305-379-0069 Fax</p> <p>25 Jweintraub@saleweintraub.com</p> <p>26 SHEPPARD, MULLIN, RICHTER & HAMPTON, LLP</p> <p>27 BY: DANIEL BROWN, Attorney at Law</p> <p>28 (Video teleconference)</p> <p>29 30 Rockefeller Plaza</p> <p>30 New York, New York 10112</p> <p>31 212-653-8700</p> <p>32 Dlbrown@sheppardmullin.com</p> <p>33 For the Defendants Soul Artist Management and Jason</p> <p>34 Kanner:</p> <p>35</p> <p>36 LEBOWITZ LAW OFFICE, LLC</p> <p>37 BY: MARC A. LEBOWITZ, Attorney at Law</p> <p>38 747 Third Avenue, 23rd Floor</p> <p>39 New York, New York 10017</p> <p>40 212-682-6818</p> <p>41 marc@lebolaw.com</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p>	<p>1 I N D E X</p> <p>2</p> <p>3 Examinations Page</p> <p>4 BY MS. WEINTRAUB 14</p> <p>5 BY MS. LEVINE-GRONNINGSATER 194</p> <p>6 BY MR. LEBOWITZ 217</p> <p>7 BY MS. WEINTRAUB (Further) 256</p> <p>8 BY MS. LEVINE-GRONNINGSATER (Further) 262</p> <p>9 BY MR. LEBOWITZ (Further) 269</p> <p>10</p> <p>11</p> <p>12 E X H I B I T S</p> <p>13 No. Description Page</p> <p>14 Exhibit 1 August 5, 2011 e-mail 26</p> <p>15 Exhibit 2 August 18, 2010 e-mail thread 43</p> <p>16 Exhibit 3 March 24, 2014 e-mail thread 57</p> <p>17 Exhibit 4 Text message string 90</p> <p>18 Exhibit 5 Text message string 96</p> <p>19 Exhibit 6 Text message string 99</p> <p>20 Exhibit 7 December 3, 2013 e-mail thread 116</p> <p>21 Exhibit 8 Text message string 119</p> <p>22 Exhibit 9 March 31, 2015 e-mail thread 122</p> <p>23 Exhibit 10 Text message string 125</p> <p>24 Exhibit 11 June 11, 2010 e-mail thread 129</p> <p>25 Exhibit 12 June 11, 2010 e-mail thread 142</p>

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<p>Page 7</p> <p>1 Los Angeles, California</p> <p>2 Tuesday, March 5, 2019</p> <p>3 10:08 a.m.</p> <p>4</p> <p>5 THE VIDEOGRAPHER: We are now going on the video</p> <p>6 record. Today is March 5th, 2019 and the time is</p> <p>7 approximately 10:08 a.m. The location is 1901 Avenue of</p> <p>8 the Stars, Los Angeles, California. My name is David</p> <p>9 Kim, Video Specialist, representing First Legal</p> <p>10 Deposition Services. The civil action number</p> <p>11 is 1606308/2017 in the matter of Jason Boyce v. Bruce</p> <p>12 Weber, et al., and the deponent is David Todd. The</p> <p>13 video deposition is requested by defense counsel,</p> <p>14 Sheppard Mullin.</p> <p>15 Will counsel please identify themselves, for the</p> <p>16 record.</p> <p>17 MS. WEINTRAUB: Jayne Weintraub on behalf of</p> <p>18 Bruce Weber along with Jonathan Etra.</p> <p>19 MR. LEBOWITZ: Marc Lebowitz, I represent Soul</p> <p>20 and Jason Kanner.</p> <p>21 MS. LEVINE-GRONNINGSATER: Anna</p> <p>22 Levine-Gronningsater from The Bloom Firm. We represent</p> <p>23 Plaintiff Jason Boyce.</p> <p>24 MR. ROTHSCHILD: Stephen Rothschild for the</p> <p>25 deponent.</p>	<p>Page 8</p> <p>1 documents. I think some account information may have</p> <p>2 been redacted on one or two of them, but otherwise</p> <p>3 they've been produced.</p> <p>4 By the way, two subpoenas were served for</p> <p>5 today's deposition: One to the deponent, individually,</p> <p>6 and one to the person most knowledgeable at DT Model</p> <p>7 Management. The deponent, David Todd, is the person</p> <p>8 most knowledgeable at DT, and will be testifying in that</p> <p>9 capacity. To the extent that he's asked questions about</p> <p>10 the matters, events, transactions, conversations that</p> <p>11 occurred, during his tenure at DT, you can, if you wish,</p> <p>12 consider those answers to be both on behalf of DT and on</p> <p>13 behalf of himself, individually. To the extent that he</p> <p>14 may be asked questions that doesn't relate to DT,</p> <p>15 obviously, that's not knowledge of DT, and he'll be</p> <p>16 testifying as to such matters in his individual</p> <p>17 capacity.</p> <p>18 Also, while we're on testimony, there's a number</p> <p>19 of categories of inquiry mentioned in the -- or listed</p> <p>20 in the subpoena to DT Model Management. Counsel and I</p> <p>21 have -- counsel for the subpoenaing party and I have met</p> <p>22 extensively by telephone, and by e-mail, both about the</p> <p>23 scope of the examination and about the scope of the</p> <p>24 requests for production, to the extent needed,</p> <p>25 incorporating those -- at least written communications</p>
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<p style="text-align: right;">Page 14</p> <p>1 conferring -- we're just going to go forward with the 2 deposition. 3 MR. ROTHSCCHILD: Thank you. 4 MR. ETRA: And could we just have a record of 5 the time now that we're done with the objection 6 discussion? 7 THE VIDEOGRAPHER: It is 10:19. And we went on 8 at 10:08. 9 MS. WEINTRAUB: And, also, for the record, Aric 10 Fudali, I noticed, from The Bloom Firm, just left the 11 conference room in New York. But he is present and will 12 be. 13 14 EXAMINATION 15 BY MS. WEINTRAUB: 16 Q. Would you please state your name, for the 17 record? 18 A. David Todd. 19 Q. Mr. Todd, my name is Jayne Weintraub. And as 20 you know, I'm one of Bruce Weber and Little Bear's 21 lawyers, along with Mr. Etra and Mr. Brown, who's in New 22 York. 23 Have you ever had your deposition taken before? 24 A. No. 25 Q. Okay. So this is going to be a question and</p>	<p style="text-align: right;">Page 16</p> <p>1 THE WITNESS: Gotta. 2 MR. ROTHSCCHILD: All right, thanks. 3 MS. WEINTRAUB: Are you done? Is that a "yes"? 4 BY MS. WEINTRAUB: 5 Q. Mr. Todd, state your date of birth for me. 6 A. August 12th, 1975. 7 Q. And your address? 8 A. 8530 Holloway Drive. 9 Q. Where is that? 10 A. West Hollywood. 11 Q. And what's the highest degree of education? 12 A. High school. 13 Q. What year did you graduate? 14 A. '93. 15 Q. Where did you go to high school? 16 A. Grant High School, Sherman Oaks. 17 Q. Is that where you grew up in Sherman Oaks from 18 the time you were a child? 19 A. Uh-huh, yep. 20 Q. What is your occupation? 21 A. The president of DT Model Management. 22 Q. And how long have you been employed in that 23 business of model management? 24 A. Twenty-five years. 25 Q. Can you give me a brief description of your</p>
<p style="text-align: right;">Page 15</p> <p>1 answer situation. I ask the questions, you provide the 2 answers to the best of your knowledge, best of your 3 ability. 4 A. Got it. 5 Q. If there's something that I ask that you don't 6 understand, feel free to just say, I don't understand 7 exactly what you're asking, and I'll be happy to 8 rephrase it. 9 A. Okay. 10 MR. ROTHSCCHILD: Make sure to pause -- 11 MS. WEINTRAUB: Excuse me, I was speaking. So 12 unless you have an objection, I'd rather you not speak. 13 So -- sorry, those are the rules. 14 BY MS. WEINTRAUB: 15 Q. You have to give me a verbal response. No 16 "uh-huh," "huh-uh," or nodding. Okay? 17 A. Okay. 18 Q. Okay. 19 MS. WEINTRAUB: Do you want to confirm? 20 MR. ROTHSCCHILD: I just want to make sure -- you 21 know, the witness hasn't been deposed before. Just -- 22 just pause. 23 THE WITNESS: Yeah. 24 MR. ROTHSCCHILD: Because otherwise the court 25 reporter will have a heart attack.</p>	<p style="text-align: right;">Page 17</p> <p>1 employment history, starting with Wilhelmina, I guess. 2 A. I started when I was 17. I was a commercial 3 print model, and then I started working at an agency 4 called It Models, as an intern. And then from there, 5 Wilhelmina hired me when I was 19. And I worked my way 6 up there to becoming the director of the men's division, 7 and I worked there until I was 27. Then went to Nous 8 Model Management for ten years. 9 Q. And Nous is spelled N-o-u-s, for the record? 10 A. Correct. And then opened my own agency in 2012. 11 Q. And that's where -- that's where we began with 12 DT Management; right? 13 A. Correct. 14 Q. You first met Jason Boyce at Nous Management? 15 A. Yes. 16 Q. And you signed him there? 17 A. Yes. 18 Q. What years did you work there? 19 A. I started there, I believe, in 2004. 20 Q. Was it 2009, about, that you met Jason? 21 A. Something like that. It would be 2008, 2009. 22 Q. The website for DT Model Management describes 23 your business as one of the leading boutique model 24 agencies. 25 A. Yes.</p>

<p style="text-align: right;">Page 30</p> <p>1 careful.</p> <p>2 A. Yes.</p> <p>3 Q. You're warning your model, basically, don't go</p> <p>4 there, you've heard things about him, and it's not a</p> <p>5 safe place?</p> <p>6 A. Yes.</p> <p>7 Q. And that's an example of how you take care of</p> <p>8 your models or look out for them, isn't it?</p> <p>9 A. Yes.</p> <p>10 Q. And you've never had any such reason to do</p> <p>11 anything like that with Bruce?</p> <p>12 A. No.</p> <p>13 MR. ROTHSCILD: Objection, vague and ambiguous;</p> <p>14 vague as to time.</p> <p>15 BY MS. WEINTRUAB:</p> <p>16 Q. Ever, in the history of your modeling agency and</p> <p>17 your models, did you ever write such an e-mail to</p> <p>18 anybody at Bruce Weber to stay away from them?</p> <p>19 MR. ROTHSCILD: That's a different question,</p> <p>20 but you can answer.</p> <p>21 THE WITNESS: No, never.</p> <p>22 BY MS. WEINTRUAB:</p> <p>23 Q. Would you agree that for a huge industry, kind</p> <p>24 of like a small community in a lot of ways, and it's</p> <p>25 important to know people's reputations?</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. And as a matter of fact, you've spoken to Mark</p> <p>2 Ricketson -- and we'll talk about it more at length --</p> <p>3 but Mark Ricketson told you that the breathing exercise</p> <p>4 did help him relax for a shoot, and that it was not</p> <p>5 sexual; isn't that right?</p> <p>6 A. I don't remember that.</p> <p>7 Q. Is what you're saying -- I want to break it</p> <p>8 down. In the 25 years -- until the lawsuit was filed,</p> <p>9 had you ever heard that Bruce Weber molested any model?</p> <p>10 A. No.</p> <p>11 Q. Had you ever heard that Bruce Weber touched any</p> <p>12 model inappropriately?</p> <p>13 A. No.</p> <p>14 Q. Had you ever heard that he ever sexually came</p> <p>15 onto somebody, sexually, not artistically, sexually?</p> <p>16 A. No.</p> <p>17 Q. So what you're saying is you did hear that there</p> <p>18 were breathing exercises to get in the zone?</p> <p>19 A. Right.</p> <p>20 Q. But from an artist- -- from an artist's</p> <p>21 perspective, you know that sometimes a model can be</p> <p>22 nervous going to a photo shoot; right?</p> <p>23 A. Yes.</p> <p>24 Q. And you know that if they're nervous, they're</p> <p>25 not going to be able to produce the best picture for you</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Yes.</p> <p>2 Q. To both questions?</p> <p>3 A. Yes.</p> <p>4 Q. It's part of your job, I guess --</p> <p>5 A. Yes.</p> <p>6 Q. -- as a responsible agent to know who your</p> <p>7 models are with; right?</p> <p>8 A. Yes.</p> <p>9 Q. And who they will be safe with, and who they</p> <p>10 might not be. You agree?</p> <p>11 A. Yes.</p> <p>12 Q. Is it a fair statement to say that in your 25</p> <p>13 years that you had never heard that Bruce Weber molests</p> <p>14 or touches his models inappropriately until the filing</p> <p>15 of this lawsuit?</p> <p>16 A. I had heard of breathing exercises and things</p> <p>17 like that, but I had never heard of anything like</p> <p>18 molesting, or touching, or anything like that. More</p> <p>19 artistically things like, you know, getting in the zone</p> <p>20 for the shoot, things like that; nothing on the level of</p> <p>21 what I'm hearing in these recent allegations.</p> <p>22 Q. As a matter of fact, Mark Ricketson spoke about</p> <p>23 breathing exercises in the press conference that you</p> <p>24 saw; right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 33</p> <p>1 as their agent to sell; agree?</p> <p>2 A. Yes.</p> <p>3 Q. And would you also agree that it's very</p> <p>4 important for the model to be as relaxed, and confident,</p> <p>5 as possible, to be able to give the photographer the</p> <p>6 best photo shoot to get the best pictures?</p> <p>7 A. Yes.</p> <p>8 Q. And so the breathing exercise was a facilitator</p> <p>9 in that -- a mechanism to relax somebody, not sexually,</p> <p>10 to get them in the zone, to use your words.</p> <p>11 There's nothing wrong with that, is there?</p> <p>12 A. It's up to the model, basically, and what they</p> <p>13 feel comfortable with. That's the best part of being a</p> <p>14 model, is you can, you know -- you're in charge of your</p> <p>15 own body. And what makes you uncomfortable, or</p> <p>16 comfortable, you have the right to say, I need to step</p> <p>17 out for a second, or I need to leave, or, you know --</p> <p>18 but this is the first time, like I said, that I ever</p> <p>19 heard anything more than what you described as the</p> <p>20 breathing exercises.</p> <p>21 Q. As a matter of fact, in one of your e-mails,</p> <p>22 right before you signed Jason Boyce -- speaking of</p> <p>23 which, when you said just now, it's up to the model to</p> <p>24 see what they're comfortable with, it was important to</p> <p>25 you, as an agent -- as a perspective agent, before you</p>

<p style="text-align: right;">Page 46</p> <p>1 man boobs --</p> <p>2 A. Yes.</p> <p>3 Q. There's -- you know what I'm saying. There's a</p> <p>4 medical expression for it, I don't know it. Do you know</p> <p>5 it. You're laughing. You know what I mean.</p> <p>6 A. I know what it is, I just don't know the name of</p> <p>7 it. But we've -- yes, we've had that happen before.</p> <p>8 Q. And that's a problem.</p> <p>9 A. Yes.</p> <p>10 Q. And you would prefer that a model not have that</p> <p>11 look?</p> <p>12 A. Exactly.</p> <p>13 Q. And you mention charm before, because</p> <p>14 personality and charm are qualities that a good</p> <p>15 photographer always wants to shine through to manifest</p> <p>16 the best picture and get the best picture; right?</p> <p>17 A. Yes.</p> <p>18 Q. And isn't that one of the reasons -- and you've</p> <p>19 discussed with Bruce Weber why he always asks what about</p> <p>20 their personality?</p> <p>21 A. Yes.</p> <p>22 Q. Because Bruce, in particular, always wanted to</p> <p>23 make sure it wasn't just a pretty face?</p> <p>24 A. Correct.</p> <p>25 Q. And Bruce always asked you, what about the</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Yes.</p> <p>2 Q. And you send models for a go-see to see if</p> <p>3 they're compatible, if they're -- or just to get a</p> <p>4 better picture?</p> <p>5 A. Yes.</p> <p>6 Q. Because one of the things you just mentioned --</p> <p>7 what's a book in your business?</p> <p>8 A. A book is the portfolio.</p> <p>9 Q. So a model has a portfolio, and why is it</p> <p>10 important that the portfolio be good?</p> <p>11 A. It's kind of like your -- your card to modeling</p> <p>12 association that the clients can see how you photograph,</p> <p>13 how you move, how your body looks, if you have a good</p> <p>14 smile. It's variations of your modeling skills, it's</p> <p>15 just like your selling card to the client.</p> <p>16 Q. Okay. I love that answer. I never thought of</p> <p>17 it that way.</p> <p>18 Okay. So that's why a go-see is -- the part</p> <p>19 part of it is just getting the pictures because that</p> <p>20 goes in the portfolio; right?</p> <p>21 A. Yes.</p> <p>22 Q. And that picture, getting those pictures in the</p> <p>23 portfolio is, then, your next selling card or how you</p> <p>24 can get picked for something?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 47</p> <p>1 personality?</p> <p>2 A. Always.</p> <p>3 Q. What's a go-see?</p> <p>4 A. It's a casting where a model goes in on their</p> <p>5 own to see the client. And we call -- we say a casting</p> <p>6 if it's multiple models at the same time. Go-see is</p> <p>7 just when you go in to meet a client and you're on your</p> <p>8 own, and you have more of a moment with the client, so</p> <p>9 they really can look at your book, and take digitals of</p> <p>10 you, talk to you, get to know you. It's more personal</p> <p>11 than a casting.</p> <p>12 Q. Because a casting could be hundreds of people in</p> <p>13 the same place doing, you know -- like an audition for a</p> <p>14 big campaign, like Ralph Lauren?</p> <p>15 A. Correct.</p> <p>16 Q. But a go-see is a one-on-one usually, the model</p> <p>17 and the photographer; right?</p> <p>18 A. Correct.</p> <p>19 Q. And it's brief?</p> <p>20 A. Yes.</p> <p>21 Q. Like 15 minutes, in and out?</p> <p>22 A. Yes.</p> <p>23 Q. That's why it's called a go-see?</p> <p>24 A. Yes.</p> <p>25 Q. And that's common in your industry?</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. So it's very important to have a good portfolio</p> <p>2 for a model?</p> <p>3 A. Yes.</p> <p>4 Q. And that's why you, as the agent, send them, if</p> <p>5 you can, to the best photographers; right?</p> <p>6 A. Yes.</p> <p>7 Q. To get the best pictures?</p> <p>8 A. Yep.</p> <p>9 Q. So that you can get them hired on a big casting</p> <p>10 for a huge commercial or something?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And that's how you make your money?</p> <p>13 A. Yes.</p> <p>14 Q. Because when your model gets hired, you make</p> <p>15 money.</p> <p>16 A. Yes.</p> <p>17 Q. Now, contrasted to a go-see, what's a casting?</p> <p>18 A. A casting is -- if it's for a specific brand --</p> <p>19 let's say, Macy's is having a casting and they're</p> <p>20 looking for blond guys with great physiques for an</p> <p>21 underwear job, then the agencies will submit their</p> <p>22 models via e-mail, or what have you --</p> <p>23 Q. You mean pictures?</p> <p>24 A. Pictures.</p> <p>25 Q. Uh-huh.</p>

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1 **A. And then the clients will call in who they want**
2 **to see to the casting. So sometimes they'll be a long**
3 **line, and maybe sometimes they'll cut it down to 100**
4 **models that they want to see, or less.**
5 Q. And then those hundred go on -- on a casting --
6 like -- I use the word audition. Is that a right word?
7 **A. Same thing.**
8 Q. Same thing?
9 Just following up before, you know, part of the
10 agent's job is, obviously, to secure work for the model;
11 right?
12 **A. Yes.**
13 Q. Because the model makes money that way, and you
14 do, the agent; right?
15 **A. Correct.**
16 Q. That's the business.
17 How does the agent find out about the castings,
18 like by specific campaign -- Macy's, in your example.
19 **A. We don't always follow-up, because there's so**
20 **many castings going on. Usually with a go-see, we**
21 **would, because a go-see is just -- it's you meeting that**
22 **one person, and we can call that -- the client, or the**
23 **photographer and say, how did the meeting go?**
24 Q. Right.
25 **A. With a big casting, we will find out about it**

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1 **after the models get put on option, or hold for the job.**
2 **And, so, in our business, we call that an option, we put**
3 **it on the chart, the casting director calls us, and**
4 **says, Joe Shmoe is on hold for Macy's, Thursday, Friday.**
5 **And that's -- we know the rest of the people are**
6 **released --**
7 Q. Okay.
8 **A. -- who we send.**
9 MR. ROTHSCHILD: Counsel, could we go off the
10 record for 60 seconds. I have a question for you.
11 MS. WEINTRAUB: Sure.
12 THE VIDEOGRAPHER: Okay. We are now going off
13 the record and the time is 11:09 a.m.
14 (Off the record.)
15 THE VIDEOGRAPHER: We are now going back on the
16 record and the time is 11:10 a.m.
17 BY MS. WEINTRUAB:
18 Q. You were just telling me how, after a casting,
19 how you find out if somebody is hired or not; right?
20 **A. Yes.**
21 Q. In comparison, in a go-see, you don't have that,
22 where a model is going to be hired; the model is there
23 to just have some pictures taken that you can see, then,
24 for future reference; right?
25 **A. If it's a photographer, sometimes they'll take**

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1 **pictures or sometimes they'll just meet the model.**
2 Q. Okay. But would you agree that -- I mean,
3 that's not where a model gets hired for a job, that's
4 just a go-see, different than a casting?
5 **A. It can lead to that later, but at the go-see,**
6 **it's not for a specific job, right.**
7 Q. Okay. And as an agent. Do you keep records of
8 all the castings that your model goes to?
9 **A. We have a -- like a system that all the castings**
10 **are in, yes.**
11 Q. And as the agent, you keep records of all the
12 castings that the model goes to, and then can you tell
13 me if that model is hired for the job that they were
14 going on the casting?
15 **A. We will know if they book it. It will say in**
16 **the system, but not -- not every single casting -- just**
17 **if they book it, then it turns red. It will change from**
18 **the casting into the booking.**
19 Q. Have you kept all of Jason Boyce's records?
20 **A. Yes, I believe we turned them -- we gave them**
21 **all to you guys.**
22 Q. Have you given us records of Jason Boyce's
23 castings?
24 **A. Yes.**
25 Q. You gave them -- you're looking at

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1 Mr. Rothschild. Did you give them to your lawyer or
2 someone else?
3 **A. We -- I remember, we, specifically, got an**
4 **e-mail from Jason's attorney asking for his contracts, I**
5 **think, and that we turned over. And, then, whatever**
6 **castings and everything else we had, I think we -- it**
7 **was in that package, I think.**
8 Q. And when is the package -- when was that package
9 compiled that you're talking about?
10 **A. I would have to go back and look.**
11 Q. Months?
12 **A. Not months?**
13 Q. Weeks?
14 **A. Maybe weeks.**
15 MR. ROTHSCHILD: I don't believe that the
16 e-mails that we got included castings.
17 **THE WITNESS: Castings? Maybe just bookings? I**
18 **have to look.**
19 MR. LEBOWITZ: Did you say you turned them over
20 to them or to the subpoenaing party?
21 **THE WITNESS: I think it went to subpoena. I**
22 **don't remember. I have to look.**
23 BY MS. WEINTRUAB:
24 Q. And it's your opinion that you gave us all the
25 records of Jason Boyce's employment?

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<p style="text-align: right;">Page 58</p> <p>1 skinny, and he wasn't that?</p> <p>2 A. Yes.</p> <p>3 Q. Now, models -- how do models get employed? Is</p> <p>4 it by the individual campaign? Is that the brand? Or</p> <p>5 is it by you? How does a model literally get hired for</p> <p>6 a shoot?</p> <p>7 MS. LEVINE-GRONNINGSATER: Objection, compound.</p> <p>8 MS. WEINTRAUB: I'm sorry, compound? You know</p> <p>9 what I'll rephrase it.</p> <p>10 BY MS. WEINTRAUB:</p> <p>11 Q. How does a model get hired for a shoot?</p> <p>12 MR. ROTHSCCHILD: Vague and ambiguous.</p> <p>13 MS. WEINTRAUB: You can answer.</p> <p>14 THE WITNESS: They go to the casting for the</p> <p>15 job, and they do the audition, or whatever the client</p> <p>16 needs them to do.</p> <p>17 BY MS. WEINTRAUB:</p> <p>18 Q. When you say clients, who do you mean? Like --</p> <p>19 A. The brand.</p> <p>20 Q. Meaning, the Macy's and your --</p> <p>21 A. Exactly. The Nike, the Macy's, the</p> <p>22 Bloomingdale's.</p> <p>23 Q. So Bloomingdale's -- just to change it up a</p> <p>24 bit -- Bloomingdale's would hire the model for a casting</p> <p>25 for a shoot?</p>	<p style="text-align: right;">Page 60</p> <p>1 MS. LEVINE-GRONNINGSATER: Same objection.</p> <p>2 BY MS. WEINTRAUB:</p> <p>3 Q. You don't give a model paychecks, unless they</p> <p>4 bring you a check, or unless a bigger check is given by</p> <p>5 the brand; right?</p> <p>6 A. Right.</p> <p>7 Q. Do you know of any campaign, commercial, or</p> <p>8 situation where Bruce Weber hired Jason Boyce for</p> <p>9 anything?</p> <p>10 A. No.</p> <p>11 Q. And to skip ahead a bit, as a matter of fact,</p> <p>12 would you agree with me, that Jason -- the thing of</p> <p>13 value that Jason got from Bruce Weber was at that go-see</p> <p>14 in December of 2014, he got pictures from Bruce Weber?</p> <p>15 MS. LEVINE-GRONNINGSATER: Objection, calls for a</p> <p>16 legal conclusion.</p> <p>17 MS. WEINTRAUB: You can answer.</p> <p>18 THE WITNESS: I don't recall that, because I was</p> <p>19 not the person that sent him to see Bruce Weber.</p> <p>20 BY MS. WEINTRAUB:</p> <p>21 Q. Well, we're going to talk about that. You had</p> <p>22 kept trying to send him to Bruce Weber?</p> <p>23 A. I kept trying, right.</p> <p>24 Q. But I guess Kanner got a favor out of him,</p> <p>25 somehow, Christmastime; right?</p>
<p style="text-align: right;">Page 59</p> <p>1 MS. LEVINE-GRONNINGSATER: Objection, calls for a</p> <p>2 legal conclusion.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MS. WEINTRAUB:</p> <p>5 Q. If Jason Boyce was going to shoot a commercial</p> <p>6 for Polaroid, who would pay him?</p> <p>7 A. The client would pay him.</p> <p>8 Q. Polaroid.</p> <p>9 A. Right.</p> <p>10 Q. The brand?</p> <p>11 A. Yes.</p> <p>12 Q. You get a percentage, as your fee --</p> <p>13 A. Yes.</p> <p>14 Q. -- for the booking. And the model becomes a</p> <p>15 1099 employee?</p> <p>16 A. Yeah. Models are independent contractors.</p> <p>17 Q. So they don't really work for you?</p> <p>18 A. No.</p> <p>19 Q. Right? They're not your employee?</p> <p>20 MS. LEVINE-GRONNINGSATER: Objection, calls for a</p> <p>21 legal conclusion.</p> <p>22 MS. WEINTRAUB: You can answer.</p> <p>23 BY MS. WEINTRAUB:</p> <p>24 Q. Is a model your employee?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 61</p> <p>1 MR. ROTHSCCHILD: Objection, it calls for</p> <p>2 speculation.</p> <p>3 MS. WEINTRAUB: If you know.</p> <p>4 MR. ROTHSCCHILD: Vague and ambiguous.</p> <p>5 MS. WEINTRAUB: That, you can answer. You can</p> <p>6 answer.</p> <p>7 THE WITNESS: I think because he was in New York</p> <p>8 --</p> <p>9 MR. ROTHSCCHILD: Well, she doesn't want you to</p> <p>10 guess.</p> <p>11 MR. ETRA: She doesn't want you to interrupt --</p> <p>12 MS. WEINTRAUB: And I also don't want you to</p> <p>13 testify, Mr. Rothschild, but I appreciate your efforts.</p> <p>14 THE WITNESS: Yeah, so I don't recall that.</p> <p>15 BY MS. WEINTRAUB:</p> <p>16 Q. Well, you do recall --</p> <p>17 A. I don't know exactly.</p> <p>18 MR. ROTHSCCHILD: One of the instructions that</p> <p>19 lawyers typically give at the beginning of</p> <p>20 depositions --</p> <p>21 MS. WEINTRAUB: Excuse me, excuse me. No, no,</p> <p>22 no. We're not going to have -- stop, stop.</p> <p>23 MR. ROTHSCCHILD: You're not to guess. If you</p> <p>24 have responsive information, you should give it, but</p> <p>25 don't guess or speculate.</p>

<p style="text-align: right;">Page 66</p> <p>1 correct to say that he's -- he was seeking employment 2 with, say, Macy's? Why is that not correct? 3 A. Because -- 4 MS. LEVINE-GRONNINGSATER: Same objection. 5 MS. WEINTRAUB: You can answer. 6 THE WITNESS: Because his employment would be if 7 you were working for -- and getting paid directly from 8 some -- from a company, or from someone you're working 9 for. Like you're an attorney, you're getting paid from 10 the firm you work for; right? I'm an agent, I'm getting 11 paid from the agency that I work for. As a model, 12 you're an independent contractor, you're getting paid 13 from the brand, or from the production company of the 14 shoot you're on, and that's how the agency gets paid. 15 BY MS. WEINTRUAB: 16 Q. Okay. In your business as the agency, is it 17 common practice to -- that models are booked for a job 18 by going to meetings or -- or interviews with people, as 19 opposed to a shoot? 20 A. I think both. Depending on what the job is, and 21 how it's being casted, it can be both ways: It can be 22 going to meet a photographer, or that's maybe has an 23 influence on the shoot. Or -- 24 Q. How would you know -- 25 MS. LEVINE-GRONNINGSATER: Objection, let him</p>	<p style="text-align: right;">Page 68</p> <p>1 have no idea what you were trying to ask. 2 MS. WEINTRAUB: I don't care what you have an 3 idea about, and that's not the record. 4 MR. ROTHSCCHILD: Okay, there's no reason to be 5 -- 6 MS. WEINTRAUB: There's no reason for you to be 7 talking. 8 MR. ROTHSCCHILD: Please, again, try -- 9 MS. WEINTRAUB: Please, just -- I am. State 10 your objection, or tell him not to answer, and knock it 11 off. 12 MR. ROTHSCCHILD: Okay. So -- this is an example 13 -- so that the attorney doesn't get too upset -- it 14 really is important for you -- 15 MS. WEINTRAUB: Okay, stop, right now. 16 MR. ROTHSCCHILD: -- to pause before you answer 17 the question, so that I can object without aggravating 18 the attorney. 19 MS. WEINTRAUB: Yeah. Are you done? You've 20 said that four times already. 21 BY MS. WEINTRUAB: 22 Q. You made a statement that I just want to talk to 23 you about. 24 Is it your opinion that certain photographers, 25 if they're well-known, can make a recommendation to a</p>
<p style="text-align: right;">Page 67</p> <p>1 finish -- let him answer the question. 2 BY MS. WEINTRUAB: 3 Q. Were you finished with that sentence? 4 A. A photographer, if it's -- if it's a known 5 photographer that has influence on the model casting, 6 then that can be a little bit different. 7 Q. Well, how would you know? 8 A. Because we know if it's a -- if it's a big 9 photographer, he can go to the production team and say I 10 want this model. 11 Q. All the time? 12 A. Not all the time, but sometimes. 13 Q. Okay. So now we've gone from a model 14 photographer can just do that to, now, sometimes. 15 A. Sometimes. 16 Q. As a matter of fact, you don't know on different 17 shoots what photographers have a voice with certain 18 brands larger than others, do you? 19 A. Correct. 20 MR. ROTHSCCHILD: You need to pause, I'm sorry. 21 The question is vague and ambiguous -- 22 MS. WEINTRAUB: Excuse me. Go ahead. It's 23 already answered. 24 MR. ROTHSCCHILD: The question is vague and 25 ambiguous, it's an incomplete hypothetical. Really, I</p>	<p style="text-align: right;">Page 69</p> <p>1 production company? 2 A. Yes. 3 Q. Do you know if that recommendation is always 4 adhered to? 5 A. No. 6 Q. Even by the biggest photographers? 7 A. No. 8 Q. Right? 9 A. Yep. 10 Q. So let's talk about Bruce Weber, for example. 11 He's a big photographer? 12 A. Yes. 13 Q. One of the best in the world? 14 A. Yes. 15 Q. And would you agree that even if Bruce Weber 16 said that, you know -- or you thought that Bruce Weber 17 could make a recommendation, if he's not the production 18 company, he doesn't have the right to tell you don't 19 worry? 20 MS. LEVINE-GRONNINGSATER: Objection, compound. 21 BY MS. WEINTRUAB: 22 Q. Right? 23 MR. ROTHSCCHILD: It's vague and ambiguous. 24 BY MS. WEINTRUAB: 25 Q. In your experience --</p>

<p style="text-align: right;">Page 66</p> <p>1 correct to say that he's -- he was seeking employment</p> <p>2 with, say, Macy's? Why is that not correct?</p> <p>3 A. Because --</p> <p>4 MS. LEVINE-GRONNINGSATER: Same objection.</p> <p>5 MS. WEINTRAUB: You can answer.</p> <p>6 THE WITNESS: Because his employment would be if</p> <p>7 you were working for -- and getting paid directly from</p> <p>8 some -- from a company, or from someone you're working</p> <p>9 for. Like you're an attorney, you're getting paid from</p> <p>10 the firm you work for; right? I'm an agent, I'm getting</p> <p>11 paid from the agency that I work for. As a model,</p> <p>12 you're an independent contractor, you're getting paid</p> <p>13 from the brand, or from the production company of the</p> <p>14 shoot you're on, and that's how the agency gets paid.</p> <p>15 BY MS. WEINTRUAB:</p> <p>16 Q. Okay. In your business as the agency, is it</p> <p>17 common practice to -- that models are booked for a job</p> <p>18 by going to meetings or -- or interviews with people, as</p> <p>19 opposed to a shoot?</p> <p>20 A. I think both. Depending on what the job is, and</p> <p>21 how it's being casted, it can be both ways: It can be</p> <p>22 going to meet a photographer, or that's maybe has an</p> <p>23 influence on the shoot. Or --</p> <p>24 Q. How would you know --</p> <p>25 MS. LEVINE-GRONNINGSATER: Objection, let him</p>	<p style="text-align: right;">Page 68</p> <p>1 have no idea what you were trying to ask.</p> <p>2 MS. WEINTRAUB: I don't care what you have an</p> <p>3 idea about, and that's not the record.</p> <p>4 MR. ROTHSCCHILD: Okay, there's no reason to be</p> <p>5 --</p> <p>6 MS. WEINTRAUB: There's no reason for you to be</p> <p>7 talking.</p> <p>8 MR. ROTHSCCHILD: Please, again, try --</p> <p>9 MS. WEINTRAUB: Please, just -- I am. State</p> <p>10 your objection, or tell him not to answer, and knock it</p> <p>11 off.</p> <p>12 MR. ROTHSCCHILD: Okay. So -- this is an example</p> <p>13 -- so that the attorney doesn't get too upset -- it</p> <p>14 really is important for you --</p> <p>15 MS. WEINTRAUB: Okay, stop, right now.</p> <p>16 MR. ROTHSCCHILD: -- to pause before you answer</p> <p>17 the question, so that I can object without aggravating</p> <p>18 the attorney.</p> <p>19 MS. WEINTRAUB: Yeah. Are you done? You've</p> <p>20 said that four times already.</p> <p>21 BY MS. WEINTRUAB:</p> <p>22 Q. You made a statement that I just want to talk to</p> <p>23 you about.</p> <p>24 Is it your opinion that certain photographers,</p> <p>25 if they're well-known, can make a recommendation to a</p>
<p style="text-align: right;">Page 67</p> <p>1 finish -- let him answer the question.</p> <p>2 BY MS. WEINTRUAB:</p> <p>3 Q. Were you finished with that sentence?</p> <p>4 A. A photographer, if it's -- if it's a known</p> <p>5 photographer that has influence on the model casting,</p> <p>6 then that can be a little bit different.</p> <p>7 Q. Well, how would you know?</p> <p>8 A. Because we know if it's a -- if it's a big</p> <p>9 photographer, he can go to the production team and say I</p> <p>10 want this model.</p> <p>11 Q. All the time?</p> <p>12 A. Not all the time, but sometimes.</p> <p>13 Q. Okay. So now we've gone from a model</p> <p>14 photographer can just do that to, now, sometimes.</p> <p>15 A. Sometimes.</p> <p>16 Q. As a matter of fact, you don't know on different</p> <p>17 shoots what photographers have a voice with certain</p> <p>18 brands larger than others, do you?</p> <p>19 A. Correct.</p> <p>20 MR. ROTHSCCHILD: You need to pause, I'm sorry.</p> <p>21 The question is vague and ambiguous --</p> <p>22 MS. WEINTRAUB: Excuse me. Go ahead. It's</p> <p>23 already answered.</p> <p>24 MR. ROTHSCCHILD: The question is vague and</p> <p>25 ambiguous, it's an incomplete hypothetical. Really, I</p>	<p style="text-align: right;">Page 69</p> <p>1 production company?</p> <p>2 A. Yes.</p> <p>3 Q. Do you know if that recommendation is always</p> <p>4 adhered to?</p> <p>5 A. No.</p> <p>6 Q. Even by the biggest photographers?</p> <p>7 A. No.</p> <p>8 Q. Right?</p> <p>9 A. Yep.</p> <p>10 Q. So let's talk about Bruce Weber, for example.</p> <p>11 He's a big photographer?</p> <p>12 A. Yes.</p> <p>13 Q. One of the best in the world?</p> <p>14 A. Yes.</p> <p>15 Q. And would you agree that even if Bruce Weber</p> <p>16 said that, you know -- or you thought that Bruce Weber</p> <p>17 could make a recommendation, if he's not the production</p> <p>18 company, he doesn't have the right to tell you don't</p> <p>19 worry?</p> <p>20 MS. LEVINE-GRONNINGSATER: Objection, compound.</p> <p>21 BY MS. WEINTRUAB:</p> <p>22 Q. Right?</p> <p>23 MR. ROTHSCCHILD: It's vague and ambiguous.</p> <p>24 BY MS. WEINTRUAB:</p> <p>25 Q. In your experience --</p>

<p style="text-align: right;">Page 70</p> <p>1 MR. ROTHSCCHILD: Excuse me.</p> <p>2 BY MS. WEINTRUAB:</p> <p>3 Q. If you understand.</p> <p>4 MR. ROTHSCCHILD: It's vague and ambiguous. It's</p> <p>5 an incomplete hypothetical.</p> <p>6 MS. WEINTRAUB: You can answer the question.</p> <p>7 MR. ROTHSCCHILD: If you understand the question,</p> <p>8 you can answer it.</p> <p>9 THE WITNESS: I think if -- I think he has a</p> <p>10 huge influence on the shoot to hire the model.</p> <p>11 BY MS. WEINTRUAB:</p> <p>12 Q. Can you give me any specific example of any</p> <p>13 shoot that you're aware of that Bruce Weber recommended</p> <p>14 somebody, and -- and it happened or didn't happen?</p> <p>15 A. I'd have to think about it, but, absolutely. I</p> <p>16 mean, there's been many of -- he's started the careers</p> <p>17 of so many male models.</p> <p>18 Q. You don't know who made the ultimate decision.</p> <p>19 Maybe they were such fabulous models that the owner of</p> <p>20 the brand or the casting director for that commercial or</p> <p>21 shoot, it was not even a close call of who would get it?</p> <p>22 MS. LEVINE-GRONNINGSATER: Objection, compound.</p> <p>23 MR. ROTHSCCHILD: The question is vague and</p> <p>24 ambiguous. It's an incomplete hypothetical. Really,</p> <p>25 it's a hopeless question. I don't know whether she's</p>	<p style="text-align: right;">Page 72</p> <p>1 BY MS. WEINTRUAB:</p> <p>2 Q. Is it fair to say when you -- you think that,</p> <p>3 say, Bruce Weber made a recommendation that a model</p> <p>4 should be hired.</p> <p>5 Are you with me so far?</p> <p>6 A. Uh-huh.</p> <p>7 Q. That it was not even a close call that that</p> <p>8 model that he was recommending was absolutely, by far,</p> <p>9 the best for that particular campaign, and they agreed;</p> <p>10 right?</p> <p>11 MR. ROTHSCCHILD: Objection, are you asking about</p> <p>12 a particular campaign or a general practice? If --</p> <p>13 MS. WEINTRAUB: I'm going to ask it -- do you</p> <p>14 have a legal objection? What's the legal objection?</p> <p>15 Let's talk like lawyers.</p> <p>16 MR. ROTHSCCHILD: Yeah, the question makes</p> <p>17 absolutely no sense. That's my legal objection.</p> <p>18 MS. LEVINE-GRONNINGSATER: I'll object on the</p> <p>19 grounds that it's an incomplete hypothetical.</p> <p>20 BY MS. WEINTRAUB:</p> <p>21 Q. You can answer the question.</p> <p>22 MR. ROTHSCCHILD: If you understand it.</p> <p>23 THE WITNESS: I understand it.</p> <p>24 MS. WEINTRAUB: Because it's clear.</p> <p>25 THE WITNESS: I think there's been both cases</p>
<p style="text-align: right;">Page 71</p> <p>1 asking about specific instances --</p> <p>2 MS. WEINTRAUB: You know what, stop talking.</p> <p>3 Stop talking.</p> <p>4 THE WITNESS: I can answer.</p> <p>5 MS. WEINTRAUB: And I'm going to direct the</p> <p>6 court reporter, since it's our deposition, unless it's a</p> <p>7 legal objection, not to even take down your</p> <p>8 pontificating crap of whether my question is hopeless,</p> <p>9 or a good question, are you going to tell me "attagirl"</p> <p>10 also? I don't want to hear it, period.</p> <p>11 MR. ROTHSCCHILD: Feel free to do that, but she's</p> <p>12 not allowed to do that.</p> <p>13 MS. WEINTRAUB: You know what, this is not for</p> <p>14 you to be talk -- why are you talking? There's not even</p> <p>15 a question pending. What are you doing?</p> <p>16 MR. ROTHSCCHILD: Well, I think that you're</p> <p>17 pretending to get exercise to confuse the witness and</p> <p>18 deflect --</p> <p>19 MS. WEINTRAUB: I am not -- stop it, stop it.</p> <p>20 You are so unprofessional and out there. It's beyond,</p> <p>21 even my Miami mind, how you are still talking. So I'm</p> <p>22 just going to ask the next question.</p> <p>23 MR. ROTHSCCHILD: And deflect attention to the</p> <p>24 question -- from the question. Now you apparently agree</p> <p>25 with me and are going to ask a new question. Let's go.</p>	<p style="text-align: right;">Page 73</p> <p>1 that I can recall in which he had -- had the power to</p> <p>2 get the model hired. And then, also, another case that</p> <p>3 I can recall where he tried very hard and the model</p> <p>4 didn't get the job. So both -- in both cases.</p> <p>5 BY MS. WEINTRAUB:</p> <p>6 Q. Because the bottom line was, it wasn't he that</p> <p>7 made the ultimate decision; it was the brand?</p> <p>8 A. Correct. He has an influence --</p> <p>9 Q. Okay.</p> <p>10 A. But at the end of the day, the brand made the</p> <p>11 decision on that specific job.</p> <p>12 Q. Okay. Well, on all jobs, I mean, isn't that</p> <p>13 true?</p> <p>14 MR. ROTHSCCHILD: Calls for speculation.</p> <p>15 MS. LEVINE-GRONNINGSATER: Objection, incomplete</p> <p>16 hypothetical.</p> <p>17 THE WITNESS: I think on certain jobs, and then</p> <p>18 there were certain jobs that he had more of a -- a</p> <p>19 say-so, like Abercrombie & Fitch or something --</p> <p>20 BY MS. WEINTRAUB:</p> <p>21 Q. Oh, you don't think my -- sorry, I didn't mean</p> <p>22 to cut you off.</p> <p>23 MR. ROTHSCCHILD: Please let him finish his</p> <p>24 answer.</p> <p>25 MS. WEINTRAUB: I said -- do you listen?</p>

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<p style="text-align: right;">Page 82</p> <p>1 Q. And is -- and what would you get about that for 2 a casting? What would his office send out? 3 A. He would usually reach out to me and just say, 4 hey, I'm working on a project for my -- you know, my 5 personal book, or -- or for a video -- a commercial that 6 he's making -- or a video he's doing, do I have any 7 great new people to show him? And then I would send him 8 a package of the cards, or the book, or digitals of the 9 models. 10 Q. Okay. Is that what you call a face sheet, or 11 what is -- 12 A. Like a portfolio, or a digital sheet. 13 Q. Okay. What's a face sheet? 14 A. So a digit- -- it's called a digital sheet. It 15 has just four different photos of the model. 16 Q. Okay. 17 A. And it's just so -- so what they can see -- they 18 can see how they look in-person -- 19 Q. Okay. 20 A. When they can't see them at a casting, instead 21 they get the digital sheet. So it's kind of more 22 realistic way of seeing what they look like in real 23 life. 24 Q. Okay. And do you remember who you used to 25 communicate in Bruce's office with?</p>	<p style="text-align: right;">Page 84</p> <p>1 him. Not financially. 2 Q. Okay. And just like you had a relationship with 3 Bruce Weber, do you think that -- or are you aware of 4 different successful modeling agencies that have their 5 own relationships with other photographers? 6 A. Yes. 7 MR. ROTHSCHILD: The question is vague and 8 ambiguous. 9 MS. WEINTRAUB: Okay. 10 BY MS. WEINTRAUB: 11 Q. I mean, you considered yourself -- 12 MS. WEINTRAUB: Are you still going on? You're 13 kidding. 14 MR. ROTHSCHILD: I'm sorry? 15 MS. WEINTRAUB: I said are you kidding? You 16 said vague and ambiguous. The question is asked and 17 answered. What is your legal reason for speaking? 18 MR. ROTHSCHILD: I need to go off the record for 19 just for one second and confer with my client. 20 MR. ETRA: There's a question pending. 21 MS. WEINTRAUB: You can't do that until the 22 question is answered. 23 MR. ROTHSCHILD: Let's go. 24 THE VIDEOGRAPHER: Going off? 25 MR. ROTHSCHILD: Yeah, we'll be back in 30</p>
<p style="text-align: right;">Page 83</p> <p>1 A. I used to communicate with Gwen and Dawn. 2 Q. And Dawn would be the one who would send out 3 notice, typically, to -- 4 A. Dawn is the more doing the casting, and Gwen was 5 the studio manager. 6 Q. And when Dawn would send out a notice, it 7 wouldn't just be to your agency, you knew that she would 8 send it out to several -- 9 A. Correct. 10 Q. -- different modeling agencies; right? 11 A. Yes. 12 Q. And then Dawn would review the different 13 pictures that you sent; right? 14 A. Right. 15 Q. And then certain -- and how would you find out 16 if you should even bring a -- one of the -- one of the 17 models in for an actual casting? 18 A. Via e-mail, or I would call the studio there and 19 just ask her, request you show these digitals to Bruce, 20 or I would e-mail Bruce and ask him if he had the time 21 to see a model. 22 Q. Fair to say that the Bruce Weber projects were, 23 obviously, not as lucrative for anybody -- 24 A. Correct. It was lucrative in the sense that 25 they could have an opportunity to meet him and work with</p>	<p style="text-align: right;">Page 85</p> <p>1 seconds. 2 THE VIDEOGRAPHER: Everybody has to agree. 3 We are going off the record and the time is 4 12:01 p.m. 5 (Off the record.) 6 THE VIDEOGRAPHER: We are now going back on the 7 record and the time is 12:05 p.m. 8 BY MS. WEINTRAUB: 9 Q. You actually credit one of the reasons you 10 became so successful was because of your relationship 11 with Bruce Weber; right? 12 A. Yes. 13 Q. Can you explain that? 14 A. So I met Bruce when I was 19, and I was working 15 at Wilhelmina. And it was when the first Abercrombie 16 campaign was kind of getting popular. And he casted -- 17 or got a new kid that I had found who was 16 years old 18 and he introduced him to Abercrombie, and got him 19 confirmed for the campaign. And I flew out with the kid 20 as his chaperone to Hollywood, Florida to meet Bruce, 21 and that's how we developed a working relationship and 22 friendship throughout the years. And that's how our 23 relationship developed. And throughout the years, I 24 continued to work with him when I left Wilhelmina, and I 25 went to Nous, and he was very supportive, and continued</p>

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<p style="text-align: right;">Page 86</p> <p>1 to call us for cast -- had his people reach out for</p> <p>2 castings, and book models through us, shoot different</p> <p>3 models. And then when I opened my agency, he continued</p> <p>4 to be supportive, as well.</p> <p>5 Q. And you considered yourself very lucky?</p> <p>6 A. Very lucky.</p> <p>7 Q. Because it's such a competitive field?</p> <p>8 A. It is.</p> <p>9 Q. Is it fair to say that not just the models --</p> <p>10 for the models, it's very competitive, but as an agent,</p> <p>11 it's very competitive, as well, to get the attention of</p> <p>12 the best photographers for a particular model, for</p> <p>13 example?</p> <p>14 A. Yes.</p> <p>15 Q. Talking about -- we touched a little before</p> <p>16 about provocative pictures that are tasteful.</p> <p>17 Okay? That's where I'm going. Mark Ricketson</p> <p>18 has publicly stated that you represented him, and we've</p> <p>19 established that; right?</p> <p>20 A. Yes.</p> <p>21 Q. And Mark has been interviewed and said that it</p> <p>22 was not at all unusual to send provocative pictures to</p> <p>23 photographers with the hope of catching their attention</p> <p>24 to get a job.</p> <p>25 Do you agree with that statement?</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. Right. And, I mean, with Bruce Weber, I mean</p> <p>2 I'll particularize it. I mean, Bruce Weber never</p> <p>3 required that you send provocative pictures of anybody,</p> <p>4 did he?</p> <p>5 A. No, he didn't.</p> <p>6 Q. As a matter of fact, most of the pictures, if</p> <p>7 not all the pictures, but a few, that you sent of your</p> <p>8 models to Bruce to look at, were not nudes; correct?</p> <p>9 A. Correct.</p> <p>10 Q. And, obviously, Bruce Weber booked models that</p> <p>11 he had never seen nude pictures of from you; right?</p> <p>12 A. Yes.</p> <p>13 Q. And isn't the bottom line with Jason Boyce that</p> <p>14 you had been trying to get Bruce Weber to take a look at</p> <p>15 him for years, and he just wasn't interested. He didn't</p> <p>16 have his look?</p> <p>17 A. I don't think he wasn't interested. I think</p> <p>18 that just -- you know, somebody that is so incredibly</p> <p>19 busy as Bruce has so many models that want to meet him,</p> <p>20 and so many people reach out to him. And it just wasn't</p> <p>21 at the top of his favorite model to meet. But I think</p> <p>22 that he thought that he had a fantastic look, and he was</p> <p>23 open to meeting him. But, unfortunately, that didn't</p> <p>24 happen.</p> <p>25 Q. Is it fair to say that you sent a nude picture</p>
<p style="text-align: right;">Page 87</p> <p>1 MR. ROTHSCILD: Can we reread the statement,</p> <p>2 please.</p> <p>3 (Record read.)</p> <p>4 MS. LEVINE-GRONNINGSATER: I'll object, compound.</p> <p>5 MS. WEINTRAUB: You can answer.</p> <p>6 THE WITNESS: I think it depends on the model</p> <p>7 and -- I think everybody is different. But I do see,</p> <p>8 right now, we're living in the selfie age of -- you</p> <p>9 know, when I started as an agent, we didn't even have a</p> <p>10 cell phone. So I think this self-promotion of taking</p> <p>11 your photo in the mirror and sending them to people, or</p> <p>12 posting them on your Instagram is very common now with</p> <p>13 models -- with -- with any young person, I think if you</p> <p>14 look at their Instagram, you see that. So I don't know</p> <p>15 in his case because I don't know what he sent, but I</p> <p>16 have definitely seen where other models have done that,</p> <p>17 in hopes that they get attention. And that the</p> <p>18 photographer -- it shows the photographer, maybe, that</p> <p>19 they're comfortable with doing sexy, risque photos.</p> <p>20 Again, I don't think it's pornographic. It's not -- if</p> <p>21 you're sending a sexy photo of yourself. If it was, you</p> <p>22 know, legs spread, that type of situation, then, we're</p> <p>23 talking about something else. But in this case, I don't</p> <p>24 think that that's what the models are sending around.</p> <p>25 BY MS. WEINTRAUB:</p>	<p style="text-align: right;">Page 89</p> <p>1 of Jason to kind of get his attention, like, hey, Bruce,</p> <p>2 look at this guy?</p> <p>3 A. I was sent the nude photo from Jason Boyce. He</p> <p>4 asked me, can you please send this to Bruce Weber.</p> <p>5 Because he really wanted to meet him. And so I said,</p> <p>6 yeah -- I said, I will forward it. It was just showing</p> <p>7 that he was confident, he knew of Bruce's repertoire of</p> <p>8 work, and that he did nudes, and that here's a photo of</p> <p>9 me nude. He took it himself. Can you forward this over</p> <p>10 to Bruce Weber.</p> <p>11 Q. So it could never be said --</p> <p>12 MS. LEVINE-GRONNINGSATER: Objection, I want you</p> <p>13 to let him finish the answer.</p> <p>14 MS. WEINTRAUB: I'm sorry, were you done? I</p> <p>15 thought you were done, I'm sorry.</p> <p>16 THE WITNESS: Yeah, I was just saying that he</p> <p>17 asked me to send it to him, to Bruce Weber.</p> <p>18 MR. ROTHSCILD: He did say "and," and then you</p> <p>19 interrupted.</p> <p>20 MS. WEINTRAUB: I apologize.</p> <p>21 THE WITNESS: I'm done.</p> <p>22 BY MS. WEINTRAUB:</p> <p>23 Q. Okay. So it could never be said that Jason</p> <p>24 Boyce had no knowledge that a nude photograph that he</p> <p>25 had taken of himself was being sent to Bruce; correct?</p>

<p style="text-align: right;">Page 86</p> <p>1 MR. ROTHSCILD: Can we reread the statement, 2 please. 3 (Record read.) 4 MS. LEVINE-GRONNINGSATER: I'll object, compound. 5 MS. WEINTRAUB: You can answer. 6 THE WITNESS: I think it depends on the model 7 and -- I think everybody is different. But I do see, 8 right now, we're living in the selfie age of -- you 9 know, when I started as an agent, we didn't even have a 10 cell phone. So I think this self-promotion of taking 11 your photo in the mirror and sending them to people, or 12 posting them on your Instagram is very common now with 13 models -- with -- with any young person, I think if you 14 look at their Instagram, you see that. So I don't know 15 in his case because I don't know what he sent, but I 16 have definitely seen where other models have done that, 17 in hopes that they get attention. And that the 18 photographer -- it shows the photographer, maybe, that 19 they're comfortable with doing sexy, risque photos. 20 Again, I don't think it's pornographic. It's not -- if 21 you're sending a sexy photo of yourself. If it was, you 22 know, legs spread, that type of situation, then, we're 23 talking about something else. But in this case, I don't 24 think that that's what the models are sending around. 25 BY MS. WEINTRAUB:</p>	<p style="text-align: right;">Page 88</p> <p>1 of Jason to kind of get his attention, like, hey, Bruce, 2 look at this guy? 3 A. I was sent the nude photo from Jason Boyce. He 4 asked me, can you please send this to Bruce Weber. 5 Because he really wanted to meet him. And so I said, 6 yeah -- I said, I will forward it. It was just showing 7 that he was confident, he knew of Bruce's repertoire of 8 work, and that he did nudes, and that here's a photo of 9 me nude. He took it himself. Can you forward this over 10 to Bruce Weber. 11 Q. So it could never be said -- 12 MS. LEVINE-GRONNINGSATER: Objection, I want you 13 to let him finish the answer. 14 MS. WEINTRAUB: I'm sorry, were you done? I 15 thought you were done, I'm sorry. 16 THE WITNESS: Yeah, I was just saying that he 17 asked me to send it to him, to Bruce Weber. 18 MR. ROTHSCILD: He did say "and," and then you 19 interrupted. 20 MS. WEINTRAUB: I apologize. 21 THE WITNESS: I'm done. 22 BY MS. WEINTRAUB: 23 Q. Okay. So it could never be said that Jason 24 Boyce had no knowledge that a nude photograph that he 25 had taken of himself was being sent to Bruce; correct?</p>
<p style="text-align: right;">Page 87</p> <p>1 Q. Right. And, I mean, with Bruce Weber, I mean 2 I'll particularize it. I mean, Bruce Weber never 3 required that you send provocative pictures of anybody, 4 did he? 5 A. No, he didn't. 6 Q. As a matter of fact, most of the pictures, if 7 not all the pictures, but a few, that you sent of your 8 models to Bruce to look at, were not nudes; correct? 9 A. Correct. 10 Q. And, obviously, Bruce Weber booked models that 11 he had never seen nude pictures of from you; right? 12 A. Yes. 13 Q. And isn't the bottom line with Jason Boyce that 14 you had been trying to get Bruce Weber to take a look at 15 him for years, and he just wasn't interested. He didn't 16 have his look? 17 A. I don't think he wasn't interested. I think 18 that just -- you know, somebody that is so incredibly 19 busy as Bruce has so many models that want to meet him, 20 and so many people reach out to him. And it just wasn't 21 at the top of his favorite model to meet. But I think 22 that he thought that he had a fantastic look, and he was 23 open to meeting him. But, unfortunately, that didn't 24 happen. 25 Q. Is it fair to say that you sent a nude picture</p>	<p style="text-align: right;">Page 89</p> <p>1 A. Correct. 2 Q. Because if somebody said that, they'd be lying? 3 A. Correct. 4 Q. Talking about -- 5 MR. ROTHSCILD: Remember to pause. I asked the 6 witness to remember to pause, because every time he 7 answers, you speak so quickly, and he answers quickly. 8 And then when I try to object, you yell at me. And I 9 want to avoid that again. 10 THE WITNESS: I'm going to pause. 11 MS. WEINTRAUB: And I'm not going to yell. So 12 there. 13 THE WITNESS: Deal. 14 BY MS. WEINTRAUB: 15 Q. I'm going to show you, now, Exhibit 4, and it 16 was -- wait, this isn't the date -- I'm going to show 17 you an e-mail as Exhibit 4, and the date is March 1st, 18 2013. And it's from you to Bruce, and then Bruce back 19 to you. And it goes on for a couple of pages. So I'm 20 going to give you the entire e-mail, just for you to 21 look at. Tell me when you're done. 22 (Exhibit 4 marked.) 23 THE WITNESS: Okay. 24 MR. ROTHSCILD: I just note, for the record, it 25 appears to be incomplete. It doesn't have any headers</p>

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<p>Page 98</p> <p>1 MR. ROTHSCCHILD: Got it, thanks.</p> <p>2 BY MS. WEINTRAUB:</p> <p>3 Q. So it's -- one is March 1st, the other is</p> <p>4 February something, a year apart. And, basically,</p> <p>5 again, you guys have the same conversation; right?</p> <p>6 A. Yeah, I don't remember having it twice, but...</p> <p>7 Q. Because -- because Bruce never followed up, and</p> <p>8 -- and he obviously wasn't interested, or he would have?</p> <p>9 MS. LEVINE-GRONNINGSATER: Objection --</p> <p>10 MR. ROTHSCCHILD: Please go ahead.</p> <p>11 MS. LEVINE-GRONNINGSATER: -- compound, calls for</p> <p>12 speculation.</p> <p>13 MR. ROTHSCCHILD: Same objections.</p> <p>14 MS. WEINTRAUB: You can answer.</p> <p>15 THE WITNESS: I don't -- I don't remember, to be</p> <p>16 honest with you. I remember that the one photo that you</p> <p>17 sent, I don't remember contacting him the second time.</p> <p>18 BY MS. WEINTRAUB:</p> <p>19 Q. Okay. But are you -- are you denying that that</p> <p>20 --</p> <p>21 A. No, it looks like they came from my phone. But</p> <p>22 it's just -- the conversations are almost exactly the</p> <p>23 same.</p> <p>24 Q. Exactly. So -- so you're not denying that that</p> <p>25 is your phone, and that that is the conversation; right?</p>	<p>Page 100</p> <p>1 BY MS. WEINTRAUB:</p> <p>2 Q. "Hey, Bruce, it's Mark Ricketson. David Todd</p> <p>3 and I felt we should share this with you." And it's a</p> <p>4 picture of Mark Ricketson from the back, on the stool --</p> <p>5 oh, I'm sorry, I'm sorry?</p> <p>6 MR. ROTHSCCHILD: That's okay. Thank you.</p> <p>7 THE WITNESS: This is from Mark Ricketson?</p> <p>8 MS. WEINTRAUB: Yeah.</p> <p>9 THE WITNESS: Got it.</p> <p>10 BY MS. WEINTRAUB:</p> <p>11 Q. Do you recognize the photograph?</p> <p>12 A. I do recognize the picture, yes.</p> <p>13 Q. And -- and Mark says that David Todd and I</p> <p>14 thought we would share this with you.</p> <p>15 Do you remember discussing it with him?</p> <p>16 A. No.</p> <p>17 Q. You don't doubt the authenticity, though?</p> <p>18 A. No, I believe it.</p> <p>19 Q. And -- and, again, that's a very tasteful</p> <p>20 picture; right?</p> <p>21 A. Yes.</p> <p>22 Q. Something that in your opinion would appeal to</p> <p>23 Bruce Weber?</p> <p>24 A. Yes.</p> <p>25 Q. And it's a nude from the back?</p>
<p>Page 99</p> <p>1 A. No.</p> <p>2 Q. Basically, I mean, you send it to him, he says</p> <p>3 very nice -- and he basically blows it off; right?</p> <p>4 MS. LEVINE-GRONNINGSATER: Objection, calls for</p> <p>5 speculation.</p> <p>6 THE WITNESS: I don't think he blows it off. I</p> <p>7 think he's just saying -- it says, I'm shooting a job.</p> <p>8 I ask him -- he says he's shooting the job, and I say,</p> <p>9 can you see him tomorrow? And I think he wasn't here.</p> <p>10 BY MS. WEINTRAUB:</p> <p>11 Q. And -- and it was never followed up; right? And</p> <p>12 Bruce never said, hey, what about that kid; right?</p> <p>13 A. No.</p> <p>14 Q. Okay. Do you agree?</p> <p>15 A. Yes.</p> <p>16 Q. And so -- and there were other people that you</p> <p>17 did send Bruce Weber a photograph of that he immediately</p> <p>18 was interested in photographing, and told you; right?</p> <p>19 A. Yes.</p> <p>20 Q. But that did not happen with Jason Boyce;</p> <p>21 correct?</p> <p>22 A. From what I recall, no.</p> <p>23 Q. I'm going to show you an e-mail between Mark --</p> <p>24 you and Mark Ricketson. And it says -- number six.</p> <p>25 (Exhibit 6 marked.)</p>	<p>Page 101</p> <p>1 A. It's almost like a replica of Bruce's work -- a</p> <p>2 copy.</p> <p>3 Q. And -- and as you said, I mean, you would agree</p> <p>4 that sending the nudes to a photographer, demonstrates</p> <p>5 that they're comfortable in their own skin; right?</p> <p>6 A. Yes.</p> <p>7 Q. And you talked about confidence. Why is</p> <p>8 confidence important that the model has?</p> <p>9 A. Well, I think it's important for the client,</p> <p>10 when they're onset, to make sure that they're going to</p> <p>11 carry out whatever the shoot has -- you know, whether</p> <p>12 it's a sport brand, and they need to run, or they need</p> <p>13 to jump, or whatever. They need to be confident that</p> <p>14 they can do that. If they're going to be wearing</p> <p>15 underwear, they need to look good in the underwear, and</p> <p>16 be confident in them, and not look, you know, timid, or</p> <p>17 shy, or... it's, basically, representing themselves in a</p> <p>18 professional way. But, also, carrying out what the</p> <p>19 brand wants, or what the -- looking good in the clothes,</p> <p>20 and having character.</p> <p>21 Q. And so it's important to exude confidence as a</p> <p>22 model; yes?</p> <p>23 A. Yes.</p> <p>24 Q. For that reason.</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 102</p> <p>1 Q. You get the best picture?</p> <p>2 A. Exactly.</p> <p>3 Q. If you're nervous, you're not confident?</p> <p>4 A. Right. And everyone can -- clients can sense</p> <p>5 that. They don't want to work with a model that's shy.</p> <p>6 Q. What do you mean?</p> <p>7 A. Like, you just gotta be in front of the camera,</p> <p>8 and be interesting, and give off a positive energy.</p> <p>9 MS. WEINTRAUB: I see you looking at watches.</p> <p>10 We can stop whenever you want.</p> <p>11 THE WITNESS: No, it's fine. Let's roll as long</p> <p>12 as we can.</p> <p>13 MR. ROTHSCCHILD: It sounds like we're going to</p> <p>14 have a lunch break whether we want one or not.</p> <p>15 THE WITNESS: Can we do it at 1:00?</p> <p>16 MS. WEINTRAUB: Sure. Is that okay with the</p> <p>17 lawyers -- it's fine with me. The later the better.</p> <p>18 Okay. I'm just going to keep going. I'll keep going,</p> <p>19 Jonathan. It's fine.</p> <p>20 BY MS. WEINTRAUB:</p> <p>21 Q. When was the first time you met Jason Boyce?</p> <p>22 A. I met him when he first came in to Nous.</p> <p>23 Q. And did we talk about 2009, about?</p> <p>24 A. Around that time.</p> <p>25 Q. Were you Jason Boyce's first modeling agent?</p>	<p style="text-align: right;">Page 104</p> <p>1 MS. WEINTRAUB: I'm looking for the contract so</p> <p>2 nobody has to guess. I don't know where it is. We'll</p> <p>3 find it at lunch.</p> <p>4 BY MS. WEINTRAUB:</p> <p>5 Q. The first year -- do you know, or can you</p> <p>6 approximate -- approximately tell us how many auditions</p> <p>7 for -- or shoots for campaigns that Jason Boyce went on?</p> <p>8 A. I don't recall. It was too long ago.</p> <p>9 Q. Do you remember what Jason's goals were, to</p> <p>10 begin with?</p> <p>11 MS. LEVINE-GRONNINGSATER: Objection, calls for</p> <p>12 speculation.</p> <p>13 MS. WEINTRAUB: I asked you if you know what</p> <p>14 Jason's goals were.</p> <p>15 MR. ROTHSCCHILD: No, you asked her if he</p> <p>16 remembered.</p> <p>17 MS. WEINTRAUB: Do you have a peashooter?</p> <p>18 THE WITNESS: I don't.</p> <p>19 MR. ROTHSCCHILD: Excuse me, counsel, we're going</p> <p>20 to take a break. That's crap. You asked -- no, you</p> <p>21 asked if he remembered, and then you changed --</p> <p>22 MS. WEINTRAUB: I said to the best of your</p> <p>23 knowledge.</p> <p>24 MR. ROTHSCCHILD: No, you asked if he remembered.</p> <p>25 MS. WEINTRAUB: I said do you know.</p>
<p style="text-align: right;">Page 103</p> <p>1 A. I believe so, yes.</p> <p>2 Q. He signed with you in Los Angeles on December</p> <p>3 12th, 2012. Does that sound right?</p> <p>4 A. Sounds about right.</p> <p>5 Q. How long was that contract for?</p> <p>6 A. Probably three years.</p> <p>7 MR. ROTHSCCHILD: She doesn't want you to guess</p> <p>8 if you don't recall.</p> <p>9 THE WITNESS: I don't recall exactly.</p> <p>10 MR. ETRA: She doesn't want you to argue with</p> <p>11 the witness' answer.</p> <p>12 MR. ROTHSCCHILD: Well, he said probably three</p> <p>13 years --</p> <p>14 MR. ETRA: It's okay.</p> <p>15 MS. WEINTRAUB: Let's just tell him what the</p> <p>16 answer is, it's okay.</p> <p>17 MR. ROTHSCCHILD: I have no idea what it is, but</p> <p>18 he said probably three years, and so I just wanted to</p> <p>19 make sure he wasn't guessing.</p> <p>20 MS. WEINTRAUB: Oh, God. Do we have the</p> <p>21 contract? I can't find it. I don't know where it is.</p> <p>22 MR. ROTHSCCHILD: Unless you want him to guess.</p> <p>23 MR. ETRA: We just want him to answer without</p> <p>24 your coaching.</p> <p>25 MR. ROTHSCCHILD: Truthfully, I assume.</p>	<p style="text-align: right;">Page 105</p> <p>1 MR. ROTHSCCHILD: Let's take a break. You said</p> <p>2 does he remember, and then you said.</p> <p>3 THE VIDEOGRAPHER: Going off?</p> <p>4 MR. ETRA: I think we're off.</p> <p>5 MR. ROTHSCCHILD: So let's not play games. Let's</p> <p>6 not try to trick the witness.</p> <p>7 MS. WEINTRAUB: Yeah, let's not.</p> <p>8 MR. ROTHSCCHILD: Let's not try to trick the</p> <p>9 witness, let's ask straightforward questions, and stop</p> <p>10 insulting people. Just ask your questions.</p> <p>11 MS. WEINTRAUB: You know what, I didn't try to</p> <p>12 trick him in any way.</p> <p>13 MR. ROTHSCCHILD: Well, maybe it was inadvertent,</p> <p>14 but you didn't phrase the question correctly --</p> <p>15 MS. WEINTRAUB: I absolutely -- you know what --</p> <p>16 you know what, I really -- I think it's actionable what</p> <p>17 you're doing already. I honestly do.</p> <p>18 MR. ROTHSCCHILD: Do you want to stop and go file</p> <p>19 your claim?</p> <p>20 MS. WEINTRAUB: I don't have to do that. I can</p> <p>21 do it at the same time. I'm pretty good at</p> <p>22 multitasking. But don't temp me. Because let me tell</p> <p>23 you something, don't tell me I'm not asking</p> <p>24 inappropriate questions. There was -- excuse me --</p> <p>25 there was nothing wrong with me asking the question, "do</p>

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1 ///

2 BY MS. WEINTRAUB:

3 Q. In 2009, '10, and '11, while he was your model,

4 and contracted with you, did he ever make more than

5 \$15,000?

6 A. I don't recall exactly how much money he made.

7 If it was that, it was not much more.

8 Q. How about 2013 and '14 and '15?

9 A. No, he wasn't -- he wasn't making much money.

10 Q. How about '16, '17, and '18, to your knowledge?

11 A. No, I don't even know if he was actively going

12 on castings, because there was a period of time where he

13 returned from New York, and he kind of stopped.

14 Q. Do you know when that was?

15 A. I'd have to go back and look. See, I don't know

16 the exact dates, but --

17 Q. Can you give me a year?

18 A. Maybe 2018 -- '17, '18.

19 Q. Okay. In 2010, Jason said to you, or asked you,

20 specifically, if he could get to meet Bruce Weber.

21 Do you remember that?

22 A. Yes.

23 Q. And he wanted to meet Bruce Weber in 2012, as

24 well, and we went through the texts; right?

25 A. Yes.

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1 Q. And we went through the pictures that were sent

2 to him and almost identical conversation between you and

3 Bruce in 2013 and 2014?

4 A. Yes.

5 Q. And he kept reaching out to meet Bruce Weber?

6 A. Yes.

7 Q. For some reason, I guess, Jason Boyce must have

8 thought that that could help him, when nothing else had

9 been helping him?

10 MR. ROTHSCHILD: Objection, calls for

11 speculation.

12 MS. LEVINE-GRONNINGSATER: I'll join.

13 THE WITNESS: Yes.

14 BY MS. WEINTRAUB:

15 Q. But when he finally gets the go-see, in December

16 2014, do you agree that every time that Bruce had been

17 approached about looking at Jason, he was either not

18 interested, didn't bother, and showed no interest?

19 A. I don't agree with that.

20 Q. Okay. Can you show me, or tell me when that

21 changed, when Bruce Weber wanted to meet Jason Boyce?

22 A. I think he was always interested in Jason. I

23 think just the time was not --

24 Q. What do you base that on?

25 MS. LEVINE-GRONNINGSATER: Counselor, please let

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1 him finish.

2 THE WITNESS: I base it on just knowing his

3 taste, and his -- the type of models that he likes. And

4 I know that Jason Boyce is very personable, and has a

5 strong face, and great body. I didn't see any reason

6 for him not to like Jason Boyce. But the time wasn't

7 right for them to meet.

8 BY MS. WEINTRAUB:

9 Q. But it -- I'm sorry.

10 A. The time wasn't right for them to meet until he

11 was in New York City and got the casting from -- from

12 Soul.

13 Q. Okay. That -- that's all just based on your

14 belief and what you know about Bruce?

15 A. Right.

16 Q. Right? But did Bruce ever say or do anything to

17 make you -- overtly -- in other words, send you an

18 e-mail, a text, a conversation, anything that you can

19 recall, did Bruce ever indicate to you in any of those

20 ways that he was interested in Jason Boyce, and wanted

21 to shoot him?

22 A. He was interested in meeting him, but he didn't

23 say he was going to shoot him.

24 Q. And where do you see that or get that from?

25 A. I just -- I mean, from the texts -- from the

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1 messages that he sent, saying, look -- what does it say?

2 He looks interesting --

3 MR. ROTHSCHILD: Which document are you looking

4 at?

5 THE WITNESS: What's his personality like? It

6 wasn't like a hard "no," you know.

7 BY MS. WEINTRAUB:

8 Q. It wasn't a hard "no"?

9 MS. LEVINE-GRONNINGSATER: Counselor, please let

10 him finish talking.

11 THE WITNESS: It wasn't a hard "no," and it

12 wasn't a -- it wasn't a "yes," exactly. It was kind of,

13 like, he was inquiring about him, but didn't say he

14 absolutely wanted to meet him.

15 BY MS. WEINTRAUB:

16 Q. Okay. So he never affirmatively said or

17 expressed an interest?

18 A. Right.

19 Q. Nor did he take any action to pursue him,

20 obviously?

21 MR. ROTHSCHILD: Objection, calls for

22 speculation.

23 BY MS. WEINTRAUB:

24 Q. To your knowledge?

25 A. He didn't.

<p style="text-align: right;">Page 130</p> <p>1 like the Exhibit 12 is from August 2009 and Exhibit 11</p> <p>2 from June 2010.</p> <p>3 THE WITNESS: Yeah, I don't remember this --</p> <p>4 MS. WEINTRAUB: Here, let me have the exhibit</p> <p>5 back.</p> <p>6 BY MS. WEINTRAUB:</p> <p>7 Q. So --</p> <p>8 MS. WEINTRAUB: This is not part of this.</p> <p>9 MR. ETRA: Okay.</p> <p>10 MS. WEINTRAUB: 12 is not part of 11.</p> <p>11 BY MS. WEINTRAUB:</p> <p>12 Q. So 11 is not its own, and it just says -- he's</p> <p>13 asking you about someone. And you say that he said that</p> <p>14 Jason was shy. And Jason's reaction is, "Shy? I let</p> <p>15 him touch me, I let him touch my balls, my cock,</p> <p>16 whatever." Right? Like -- he tried to get me erect, I</p> <p>17 tried to do everything and anything, what are you</p> <p>18 talking about, shy? Isn't that what he's saying to you?</p> <p>19 MS. LEVINE-GRONNINGSATER: Objection, misstates</p> <p>20 prior testimony.</p> <p>21 MR. ROTHSCCHILD: Yeah, the document speaks for</p> <p>22 itself and it's been read into the record. I don't know</p> <p>23 whether it's three or four times so far, but...</p> <p>24 BY MS. WEINTRAUB:</p> <p>25 Q. The point is that when something came up like</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. Was it a reasonable expectation that Jason would</p> <p>2 think just because Kanner had gotten him a go-see that</p> <p>3 now he's going to be hired by Bruce Weber?</p> <p>4 A. I think it was a wish. I -- like most models</p> <p>5 wish.</p> <p>6 Q. And the old expression of "wishing doesn't make</p> <p>7 it so," have you heard?</p> <p>8 A. Yes.</p> <p>9 Q. And so it might have been a wish -- I mean, I</p> <p>10 wish I would win the lottery and this case would</p> <p>11 disappear. I don't think either one of those things are</p> <p>12 happening any time soon.</p> <p>13 But a wish is just that; right?</p> <p>14 MR. ROTHSCCHILD: Objection, argumentative and</p> <p>15 it's --</p> <p>16 MS. WEINTRAUB: Mr. Rothschild, I didn't say</p> <p>17 what I really wished.</p> <p>18 MR. ROTHSCCHILD: It's -- I mean it's just a</p> <p>19 silly question.</p> <p>20 MS. LEVINE-GRONNINGSATER: I'll join.</p> <p>21 MS. WEINTRAUB: I'll rephrase.</p> <p>22 BY MS. WEINTRAUB:</p> <p>23 Q. Wishing is what Dorothy in the Wizard of Oz did</p> <p>24 when she clicked her heels; right?</p> <p>25 MR. ROTHSCCHILD: You don't have to answer that.</p>
<p style="text-align: right;">Page 131</p> <p>1 that, Jason told you about it?</p> <p>2 A. Yeah, I think he would tell me about it.</p> <p>3 Q. And that was back in 2010?</p> <p>4 A. Yeah.</p> <p>5 Q. And you only got closer with him as years went</p> <p>6 by; right?</p> <p>7 A. Yes.</p> <p>8 Q. And he never called you up and told you anything</p> <p>9 else had ever happened to him?</p> <p>10 A. No.</p> <p>11 Q. He never called you and told you anything about</p> <p>12 Bruce Weber?</p> <p>13 A. No.</p> <p>14 Q. Was it -- after all of these rejections by Jason</p> <p>15 Boyce, by 2014, was it a reasonable expectation in your</p> <p>16 opinion for Jason to think that just because he's</p> <p>17 finally getting a go-see with Bruce Weber, that he was</p> <p>18 going to get hired by him?</p> <p>19 A. I think he was hoping that he would, because --</p> <p>20 Q. I understand -- sorry, go ahead.</p> <p>21 A. Everyone would always say, oh, you would be</p> <p>22 great for Bruce Weber, to him. And I think he really</p> <p>23 was hoping that Bruce would hire him.</p> <p>24 Q. But was it a reasonable -- I'm sorry?</p> <p>25 A. Or shoot him, photograph him.</p>	<p style="text-align: right;">Page 133</p> <p>1 MS. WEINTRAUB: Yeah, I think he does.</p> <p>2 MR. ROTHSCCHILD: No, doesn't.</p> <p>3 MR. WEINTRAUB: I'm making a point. I'm being</p> <p>4 very serious.</p> <p>5 MR. ROTHSCCHILD: I know you're trying to make a</p> <p>6 point. The question is argumentative and it's not a</p> <p>7 real question. Please, ask real questions.</p> <p>8 BY MS. WEINTRAUB:</p> <p>9 Q. So it was a wish of Jason's, but it's not a</p> <p>10 reasonable expectation at that point.</p> <p>11 Do you agree?</p> <p>12 MS. LEVINE-GRONNINGSATER: Objection, asked and</p> <p>13 answered.</p> <p>14 MS. WEINTRAUB: It has not been answered.</p> <p>15 THE WITNESS: I think his wish meeting him came</p> <p>16 to fruition, but, perhaps, not getting a paid photo</p> <p>17 shoot.</p> <p>18 BY MS. WEINTRAUB:</p> <p>19 Q. Okay, but that's not answering the question.</p> <p>20 The question is, it was a wish, not a reasonable</p> <p>21 expectation; right?</p> <p>22 MS. LEVINE-GRONNINGSATER: Objection, calls for</p> <p>23 speculation.</p> <p>24 MS. WEINTRAUB: You can answer.</p> <p>25 THE WITNESS: I -- I don't know how to answer</p>

<p style="text-align: right;">Page 166</p> <p>1 Q. He did the Discover card; right?</p> <p>2 A. Yes, I introduced him to his commercial agent</p> <p>3 and --</p> <p>4 Q. And who was that?</p> <p>5 A. Anna at Photogenics.</p> <p>6 Q. Okay. And he was trying to get acting gigs?</p> <p>7 A. Yes.</p> <p>8 Q. Because, in one way or another, he was</p> <p>9 reconciling with the fact that he just wasn't going to</p> <p>10 make it as a model?</p> <p>11 A. I think his interests shifted from modeling to</p> <p>12 acting, once he started to see that that was working out</p> <p>13 much better for him.</p> <p>14 Q. Let me ask you this. Would you agree with me,</p> <p>15 from 2009 to December 2015, that nothing changed in his</p> <p>16 career, basically?</p> <p>17 A. Nothing changed in his modeling career.</p> <p>18 Q. Let me rephrase it. If you had to do a graph of</p> <p>19 Jason Boyce's career as a model, would it be going up,</p> <p>20 or would it be flat across, basically?</p> <p>21 A. Across.</p> <p>22 Q. Meaning, nothing?</p> <p>23 A. (Nods head.)</p> <p>24 Q. From beginning to end; right?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 168</p> <p>1 another, from the beginning.</p> <p>2 MR. ROTHSCHILD: There's no question pending.</p> <p>3 BY MS. WEINTRAUB:</p> <p>4 Q. Doesn't it? Thank you.</p> <p>5 A. I think he really wanted to work with him.</p> <p>6 MS. LEVINE-GRONNINGSATER: Objection, calls for</p> <p>7 speculation.</p> <p>8 BY MS. WEINTRAUB:</p> <p>9 Q. Have you ever had a model, asking you,</p> <p>10 relentlessly, year after year in so many different ways,</p> <p>11 to get you with one particular person?</p> <p>12 A. Not that I can recall.</p> <p>13 Q. Very unusual; right?</p> <p>14 A. Yes.</p> <p>15 Q. Would you say extraordinary?</p> <p>16 A. Unusual.</p> <p>17 Q. And you can't think of any other instance;</p> <p>18 right?</p> <p>19 A. Yeah.</p> <p>20 Q. Do you want me to mark this as an exhibit?</p> <p>21 MR. ROTHSCHILD: It's your record, it's your</p> <p>22 case.</p> <p>23 BY MS. WEINTRAUB:</p> <p>24 Q. And, again, right after that e-mail about</p> <p>25 sending another naked one to Bruce Weber, he says -- you</p>
<p style="text-align: right;">Page 167</p> <p>1 Q. And so would you agree with me that by the time</p> <p>2 he gets to 2014, '15, and he's 28 years old, he was</p> <p>3 done, nobody was picking him up?</p> <p>4 MS. LEVINE-GRONNINGSATER: Objection, compound.</p> <p>5 MS. WEINTRAUB: You can answer.</p> <p>6 THE WITNESS: I think he felt like it was time</p> <p>7 to focus on something else.</p> <p>8 BY MS. WEINTRAUB:</p> <p>9 Q. Okay. It had nothing to do with anything that</p> <p>10 he claimed happened with Bruce Weber in December of 2014</p> <p>11 or '15, did it?</p> <p>12 MS. LEVINE-GRONNINGSATER: Objection, calls for</p> <p>13 speculation.</p> <p>14 THE WITNESS: That, I don't know.</p> <p>15 BY MS. WEINTRAUB:</p> <p>16 Q. May 19th, the spring of 2014, Jason Boyce writes</p> <p>17 to you, DT 946. "If I take a naked one, maybe send it</p> <p>18 to Bruce Weber or somebody."</p> <p>19 Do you remember that?</p> <p>20 A. Yes.</p> <p>21 Q. It seems like -- did he write that about anybody</p> <p>22 else, any other photographers?</p> <p>23 A. Not that I can think of.</p> <p>24 Q. Kind of seems like he was almost obsessed with</p> <p>25 getting in front of Bruce Weber for some reason or</p>	<p style="text-align: right;">Page 169</p> <p>1 write, "Nothing is wrong with you. You are the best.</p> <p>2 It's super frustrating and competitive, I know."</p> <p>3 And he writes, "That's really frustrating.</p> <p>4 Everybody says they're going to book me and they never</p> <p>5 do. I can even get an agency in Spain to take me. I</p> <p>6 want to stay positive, but it gets so hard sometimes.</p> <p>7 What's wrong with me?"</p> <p>8 Right?</p> <p>9 MS. LEVINE-GRONNINGSATER: Objection, is there a</p> <p>10 question.</p> <p>11 BY MS. WEINTRAUB:</p> <p>12 Q. Do you agree that was a conversation?</p> <p>13 A. Yes.</p> <p>14 Q. And, actually, you write at the very beginning</p> <p>15 of that, "I'm booking you for a shoot with Darren" --</p> <p>16 A. Teiste.</p> <p>17 Q. And who is Darren Tieste?</p> <p>18 A. Photographer.</p> <p>19 Q. And he has a different kind of look with -- and</p> <p>20 that was right before Bruce Weber; right?</p> <p>21 MS. LEVINE-GRONNINGSATER: Objection, vague and</p> <p>22 ambiguous.</p> <p>23 BY MS. WEINTRAUB:</p> <p>24 Q. Do you remember when it was?</p> <p>25 A. I don't.</p>

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1 switch the microphone over to the questioner.
 2 MR. ETRA: Do you need a break or no?
 3 THE VIDEOGRAPHER: I'm just going to switch it
 4 -- I'm going to switch a mic to you. We're going to go
 5 off the record for very briefly. We are now going off
 6 the record and the time is 3:52 p.m.
 7 (Off the record.)
 8 THE VIDEOGRAPHER: We are now going back on the
 9 record and the time is 3:54 p.m.
 10
 11 EXAMINATION
 12 BY MS. LEVINE-GRONNINGSATER:
 13 Q. Mr. Todd, we met earlier. I'm Anna
 14 Levine-Gronningsater. I'm one of the attorneys for
 15 Plaintiff Jason Boyce. I'm going to ask you a few
 16 questions, if that's okay?
 17 A. Yep.
 18 Q. So do you remember at the beginning of the
 19 deposition when defense counsel, Ms. Weintraub, gave you
 20 some instructions about how today was going to go?
 21 A. Yes.
 22 Q. Did she tell you that it was important not to
 23 guess?
 24 A. Yes.
 25 Q. You heard her say it's important --

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1 A. I didn't hear her say. I heard my attorney tell
 2 me not to guess.
 3 Q. Okay. So I wanted to make sure it's on the
 4 record that it's actually important not to guess. You
 5 might think it's helpful to guess. Rather than saying,
 6 I really don't know, I have no idea, but it's actually
 7 not helpful. It's a little more confusing.
 8 Going back to that, you testified earlier about
 9 an injury that Mr. Boyce had; is that correct?
 10 A. Yes.
 11 Q. What kind of injury?
 12 A. I don't remember exactly what it was. I just
 13 remember he had some type of -- like a hernia or
 14 something in his groin, something like that.
 15 Q. Does staph infection sound familiar?
 16 A. Yeah, something like that.
 17 Q. And you testified as to the timing. Do you know
 18 when that staph infection was?
 19 A. It was definitely when he returned from New
 20 York.
 21 Q. By when, do you remember mean after?
 22 A. After New York.
 23 Q. Does fall of 2016 sound right?
 24 A. I would have to know the date that he came back
 25 from New York City. But that sounds accurate, because

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1 it was after the holidays.
 2 Q. Okay. And you also said at some point that when
 3 he got back from New York, he just stopped going on
 4 modeling castings; is that right?
 5 A. Yes.
 6 Q. And do you know what year -- what years we're
 7 talking about there?
 8 A. We're talking about when he came back from New
 9 York City.
 10 Q. So --
 11 A. It was right after that.
 12 Q. -- do you know the year that he last got back
 13 from New York City?
 14 A. I don't.
 15 Q. Does 2015 sound right?
 16 A. It sounds about right.
 17 Q. And I know I just said don't guess, and I'm kind
 18 of inviting you to guess --
 19 A. It sounds right, though, because we're in 2019,
 20 and this case has been -- it makes sense.
 21 Q. And I'm just trying to clarify that if there's
 22 some guesses going on and you don't know, that's okay,
 23 you can say you don't know.
 24 Earlier, when we were off the record -- strike
 25 that.

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1 When you came back from a break, you said you
 2 wanted to make a correction about not being involved in
 3 this complaint; is that right?
 4 A. Not a correction. I just wanted to be clear
 5 about it, because I had heard some rumblings that we did
 6 have something to do with this case. And, then, the --
 7 orchestrating the case.
 8 Q. And where did you hear those rumblings?
 9 A. I heard it from his client's side.
 10 Q. And, for the record, are you pointing to
 11 Mr. Kanner's attorney?
 12 A. Yes.
 13 Q. You heard it from Mr. Kanner's attorney or from
 14 Mr. Kanner?
 15 A. No, from -- from his client's side, telling
 16 people.
 17 Q. So Mr. Kanner and Soul artist have been telling
 18 people that you orchestrated this complaint?
 19 A. Yes.
 20 Q. What have they been saying?
 21 A. I don't know, verbatim, exactly what was said.
 22 All I know is that several people told me that they
 23 heard from his -- from his company, or from him,
 24 directly, that I was the one who put this in Jason
 25 Boyce's head.

<p style="text-align: right;">Page 198</p> <p>1 Q. When did you hear that?</p> <p>2 A. I heard -- I started hearing it after the media</p> <p>3 started coming out.</p> <p>4 Q. And why is it important for you to correct the</p> <p>5 record?</p> <p>6 A. It's important for me, because it's absolutely</p> <p>7 false. And I would never do that, and nobody in my</p> <p>8 office would ever do that. And it was important for me</p> <p>9 to make sure that everybody involved knew that,</p> <p>10 including Bruce Weber, including Jason Boyce, and</p> <p>11 including anyone that was told that.</p> <p>12 Q. I'm going to introduce an exhibit -- I believe</p> <p>13 we're at Exhibit 15; is that right?</p> <p>14 MR. ROTHCHILD: Yep.</p> <p>15 MS. WEINTRAUB: You want to make it plaintiff's</p> <p>16 exhibit --</p> <p>17 MR. ETRA: It's 15 to the deposition.</p> <p>18 MS. LEVINE-GRONNINGSATER: That I'm handing to</p> <p>19 the witness. I'll hand a copy to counsel, as well.</p> <p>20 MR. ROTHCHILD: Thank you.</p> <p>21 (Exhibit 15 marked.)</p> <p>22 BY MS. LEVINE-GRONNINGSATER:</p> <p>23 Q. Do you recognize this document?</p> <p>24 A. I do.</p> <p>25 Q. What is this document?</p>	<p style="text-align: right;">Page 200</p> <p>1 lingo, in terms of sending models out for jobs. We</p> <p>2 talked about go-sees.</p> <p>3 What is a test shoot?</p> <p>4 A. So a test shoot is when you go and you do a</p> <p>5 photo shoot for your portfolio, with a photographer,</p> <p>6 that's not a paying job. It's just to get pictures for</p> <p>7 your book.</p> <p>8 Q. And what's the difference between a test shoot</p> <p>9 and a go-see?</p> <p>10 A. So at a go-see, you're not doing -- you're not</p> <p>11 taking pictures; you're just meeting someone, whether</p> <p>12 it's the photographer, the client, the stylist, anyone</p> <p>13 involved with the production. And when you're going on</p> <p>14 a test, you're shooting photos.</p> <p>15 Q. Got it. Have you ever seen a model go to a</p> <p>16 go-see, or a test shoot and get a job out of it?</p> <p>17 A. Yes.</p> <p>18 Q. Have you ever seen Jason go to a go-see and a</p> <p>19 test shoot and get a job out of it?</p> <p>20 A. I can't recall. I don't want to guess.</p> <p>21 Q. Good.</p> <p>22 A. I know he went on a MAC casting. I just</p> <p>23 remembered that. He booked a MAC event, here in LA.</p> <p>24 Q. So we talked about Jason's -- strike that.</p> <p>25 You testified about Jason's success, or lack</p>
<p style="text-align: right;">Page 199</p> <p>1 A. This is a mother agency agreement between us and</p> <p>2 Soul Models.</p> <p>3 Q. Can you explain what that is for me, please?</p> <p>4 A. So, basically, what it means is when we develop</p> <p>5 a model, and put together their career -- their</p> <p>6 portfolio, and everything from scratch, and we're ready</p> <p>7 to have them travel, when we place them with an agency</p> <p>8 elsewhere, outside of California, we send a mother</p> <p>9 agency agreement, in which we receive ten percent of</p> <p>10 their earnings. And this is a standard thing in -- it's</p> <p>11 all over the world.</p> <p>12 Q. And in this case, who is the other agency?</p> <p>13 A. Soul Models.</p> <p>14 Q. Do you have other mother agency agreements with</p> <p>15 Soul?</p> <p>16 A. We did.</p> <p>17 Q. Are you familiar with Soul's business?</p> <p>18 A. Yes.</p> <p>19 Q. And what is Soul -- what is Soul's business?</p> <p>20 A. A modeling agency in New York City.</p> <p>21 Q. And as a modeling agency, what is their job?</p> <p>22 A. To procure jobs for models and send them on</p> <p>23 castings, and develop careers.</p> <p>24 Q. I want to ask you a little more -- and I don't</p> <p>25 want to belabor the point -- about these -- I guess the</p>	<p style="text-align: right;">Page 201</p> <p>1 thereof, in the modeling industry. Did he have any</p> <p>2 successes in the industry?</p> <p>3 A. Yeah, I mean, I think he shot with some really</p> <p>4 good photographers that believed in him and really</p> <p>5 wanted to work with him. And he did a couple of jobs --</p> <p>6 I'm thinking back to something for American Crew, MAC</p> <p>7 Cosmetics. He definitely booked some cool jobs. It</p> <p>8 just wasn't on the level, maybe, of more successful,</p> <p>9 bigger campaign model.</p> <p>10 Q. Can you name for me a successful, bigger</p> <p>11 campaign model?</p> <p>12 A. Like, Alex Lundqvist, or Garrett Neff -- I'm</p> <p>13 throwing it way back. I'm going to say, like, Marcus</p> <p>14 Schenkenberg. You know what I mean?</p> <p>15 Q. Him, I -- him, I know of.</p> <p>16 You testified earlier that a model can be in a</p> <p>17 photo shoot and say, I'm leaving now, I'm uncomfortable.</p> <p>18 Do you remember that?</p> <p>19 A. Yeah. They basically can step away and call the</p> <p>20 agency, and say, this is what's going on, I'm</p> <p>21 uncomfortable, that type of situation.</p> <p>22 Q. Has that -- has that happened in -- with any of</p> <p>23 your models before?</p> <p>24 A. It hasn't happened in that aspect of, like, a</p> <p>25 sexual type of thing. But, maybe, somebody being nasty</p>

<p style="text-align: right;">Page 206</p> <p>1 a model to be able to meet with Mr. Weber; is that true?</p> <p>2 A. Yes.</p> <p>3 Q. How so?</p> <p>4 A. Being the fact that it's difficult to get a</p> <p>5 meeting with him, and he shoots a lot of major jobs, and</p> <p>6 to be able to get a meeting with him is -- is -- could</p> <p>7 be a career changing opportunity for the model if they</p> <p>8 do book a campaign from him, or get a photograph for a</p> <p>9 big magazine, it could be a great -- a great thing.</p> <p>10 Q. And he has helped a lot of models?</p> <p>11 A. Yeah, so many.</p> <p>12 Q. And it sounds like he helped you?</p> <p>13 A. Yeah.</p> <p>14 Q. You've said very kind things about Mr. Weber and</p> <p>15 Mr. Boyce. What -- what do you see your role as to</p> <p>16 Mr. Boyce being? That is a terrible question. Let me</p> <p>17 -- let me rephrase that.</p> <p>18 MR. ETRA: Thank you.</p> <p>19 BY MS. LEVINE-GRONNINGSATER:</p> <p>20 Q. What was your job in terms of helping Mr. Boyce?</p> <p>21 A. Like a --</p> <p>22 MS. WEINTRAUB: Could we have a time frame?</p> <p>23 Objection, could we have a time frame?</p> <p>24 BY MS. LEVINE-GRONNINGSATER:</p> <p>25 Q. From the time that Mr. Boyce signed with you</p>	<p style="text-align: right;">Page 208</p> <p>1 request, I thought he would be able to get in there and</p> <p>2 nail -- and get a booking -- a great job with him, or at</p> <p>3 least photographed by him.</p> <p>4 Q. And why did you think those photos would help</p> <p>5 him meet Mr. Weber?</p> <p>6 A. Why did I think?</p> <p>7 MS. WEINTRAUB: I'm going to object. What -- we</p> <p>8 have seen over a dozen pictures of Jason Boyce. I don't</p> <p>9 know what pictures you're talking about.</p> <p>10 BY MS. LEVINE-GRONNINGSATER:</p> <p>11 Q. How many pictures of Mr. Boyce did you send to</p> <p>12 Mr. Weber?</p> <p>13 A. I believe two that I saw in the texts -- at</p> <p>14 least two of the selfies that he sent to me.</p> <p>15 Q. So let's just focus on those two text pictures.</p> <p>16 Why did you think sending those would help Mr. Boyce?</p> <p>17 A. Because it showed his confidence, and it showed</p> <p>18 that he looked fantastic, and I thought that Mr. Weber</p> <p>19 would react to those right away, and want to meet him.</p> <p>20 Q. How many nude photos have you sent to Mr. Weber?</p> <p>21 A. Nude photos? Like that the models send like</p> <p>22 that?</p> <p>23 Q. Nude photos -- yes.</p> <p>24 MR. ROTHSCCHILD: Just so I understand, are you</p> <p>25 asking, nude photos that Mr. Todd initiated, or that</p>
<p style="text-align: right;">Page 207</p> <p>1 until 2015, what was your job, in terms of helping</p> <p>2 Mr. Boyce?</p> <p>3 MR. ROTHSCCHILD: Just so I'm clear, because I'm</p> <p>4 not clear on all the chronology of this case. Are you</p> <p>5 asking about what Mr. Todd's role was when Mr. Boyce was</p> <p>6 signed to his agency?</p> <p>7 MS. LEVINE-GRONNINGSATER: Yes, thank you.</p> <p>8 THE WITNESS: Well, I was his agent, his mother</p> <p>9 agent. So kind of like a manager, but not really a</p> <p>10 talent manager, an agent -- modeling agent, and his main</p> <p>11 person that he would speak to, or come to, and -- you</p> <p>12 know, to help arrange and put all the pieces together,</p> <p>13 to the puzzle.</p> <p>14 BY MS. LEVINE-GRONNINGSATER:</p> <p>15 Q. And you wanted to help him?</p> <p>16 A. Yes.</p> <p>17 Q. And, in fact, you benefited financially if he</p> <p>18 was successful?</p> <p>19 A. Yes.</p> <p>20 Q. So when you sent photographs of him to</p> <p>21 Mr. Weber, you thought you were helping him?</p> <p>22 A. Yes.</p> <p>23 Q. Why is that?</p> <p>24 A. Because I think that he really wanted to work</p> <p>25 with Mr. Weber. And that by sending the photos, at his</p>	<p style="text-align: right;">Page 209</p> <p>1 were sent to him to relay to Mr. Weber? Or some other</p> <p>2 subcategory of that?</p> <p>3 MS. LEVINE-GRONNINGSATER: Strike that.</p> <p>4 MS. WEINTRAUB: Good objection.</p> <p>5 MR. ROTHSCCHILD: All my objections are good.</p> <p>6 MS. WEINTRAUB: Very few.</p> <p>7 MR. ROTHSCCHILD: I'm surprised to --</p> <p>8 BY MS. LEVINE-GRONNINGSATER:</p> <p>9 Q. The purpose of sending these photographs was to</p> <p>10 get a meeting with Mr. Weber; right?</p> <p>11 A. Right.</p> <p>12 Q. And just a meeting with Mr. Weber was valuable</p> <p>13 to an aspiring model; right?</p> <p>14 A. Correct.</p> <p>15 Q. You testified earlier that your models at your</p> <p>16 agency are independent contractors; right?</p> <p>17 A. Yes.</p> <p>18 Q. And that testimony was based on your lay opinion</p> <p>19 of independent contractors versus employees; right?</p> <p>20 A. On my what opinion?</p> <p>21 MS. WEINTRAUB: Exactly.</p> <p>22 BY MS. LEVINE-GRONNINGSATER:</p> <p>23 Q. Your opinion not as a legal expert.</p> <p>24 MR. ROTHSCCHILD: You're asking whether it's just</p> <p>25 based on his general understanding?</p>

<p style="text-align: right;">Page 210</p> <p>1 MS. LEVINE-GRONNINGSATER: Sure.</p> <p>2 MS. WEINTRAUB: Good coaching.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MS. LEVINE-GRONNINGSATER:</p> <p>5 Q. And are you implying New York law or California</p> <p>6 law?</p> <p>7 A. Well, it would be California law.</p> <p>8 Q. Okay.</p> <p>9 MR. LEBOWITZ: Objection --</p> <p>10 BY MS. LEVINE-GRONNINGSATER:</p> <p>11 Q. Do you have the communication where Mr. Boyce --</p> <p>12 MR. LEBOWITZ: By objection, you said he wasn't</p> <p>13 applying any legal principle. The fact that he was</p> <p>14 asking which state --</p> <p>15 MR. ROTHCHILD: Yeah, I think that's correct.</p> <p>16 I think he's just saying --</p> <p>17 (Attorneys speaking simultaneously.)</p> <p>18 THE REPORTER: Counsel, I can't get all of you.</p> <p>19 MR. LEBOWITZ: No, because he just opened</p> <p>20 himself as a legal expert on employment law since he is</p> <p>21 able to conclude it's California law and not New York</p> <p>22 law.</p> <p>23 MR. ROTHCHILD: Well, I don't think so. I</p> <p>24 think he's just doing the best he can. And I think what</p> <p>25 he may have meant is that he's California business. In</p>	<p style="text-align: right;">Page 212</p> <p>1 Q. To any extent, do they need to be comfortable</p> <p>2 being touched?</p> <p>3 A. No.</p> <p>4 Q. Is there a difference between sending a naked</p> <p>5 selfie and letting someone touch you?</p> <p>6 A. Yes.</p> <p>7 Q. Did you send those naked pictures of Mr. Boyce</p> <p>8 to Mr. Weber as an invitation to touch Mr. Boyce?</p> <p>9 A. No.</p> <p>10 Q. Have you ever worked with models on set in New</p> <p>11 York?</p> <p>12 A. No.</p> <p>13 Q. Did the other model that you sent naked pictures</p> <p>14 to Bruce for ask you to send those -- excuse me -- to</p> <p>15 Mr. Weber -- ask you to send that photograph to</p> <p>16 Mr. Weber?</p> <p>17 A. Did the other model? Which one?</p> <p>18 Q. So let's go to Exhibit 14.</p> <p>19 A. Oh, Matt? Yes.</p> <p>20 MR. ROTHCHILD: Is that an answer to her</p> <p>21 question or --</p> <p>22 THE WITNESS: It's an answer to her question,</p> <p>23 yes.</p> <p>24 BY MS. LEVINE-GRONNINGSATER:</p> <p>25 Q. Did Mr. Weber ever indicate to you that he</p>
<p style="text-align: right;">Page 211</p> <p>1 California, his models are booked as independent</p> <p>2 contractors and he thinks that's the way it's supposed</p> <p>3 to be done.</p> <p>4 BY MS. LEVINE-GRONNINGSATER:</p> <p>5 Q. Do you have the communication where Mr. Boyce</p> <p>6 asked you to send pictures to Mr. Weber?</p> <p>7 A. It should be in those texts. He says several</p> <p>8 times in the text, like, can you -- you know, what do</p> <p>9 you think about these for Mr. Weber.</p> <p>10 Q. So -- so I have those.</p> <p>11 A. Yeah.</p> <p>12 Q. Okay.</p> <p>13 MR. LEBOWITZ: Do we all have them?</p> <p>14 THE WITNESS: I see them in this stack here.</p> <p>15 You should.</p> <p>16 MR. LEBOWITZ: Okay, they're in what we looked</p> <p>17 at today? That's fine. Thank you.</p> <p>18 THE WITNESS: Yeah.</p> <p>19 BY MS. LEVINE-GRONNINGSATER:</p> <p>20 Q. You testified earlier that models need to be</p> <p>21 comfortable showing skin; is that right?</p> <p>22 A. Correct.</p> <p>23 Q. To some extent, do they need to be comfortable</p> <p>24 being touched?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 213</p> <p>1 enjoyed or didn't enjoy getting these nude selfies?</p> <p>2 A. No.</p> <p>3 Q. Did you ever tell you to stop sending them?</p> <p>4 A. No.</p> <p>5 Q. In your experience, would a model be excited at</p> <p>6 the opportunity to shoot --</p> <p>7 MS. WEINTRAUB: Objection, pure -- sorry, go</p> <p>8 ahead.</p> <p>9 MR. ROTHCHILD: Let her finish her question.</p> <p>10 BY MS. LEVINE-GRONNINGSATER:</p> <p>11 Q. Would a model be excited at the opportunity for</p> <p>12 a photo shoot with Mr. Weber?</p> <p>13 A. Yes.</p> <p>14 Q. Does a photo shoot with Mr. Weber offer</p> <p>15 advantage to a model?</p> <p>16 MS. WEINTRAUB: Objection, asked and answered</p> <p>17 like three times already.</p> <p>18 THE WITNESS: Yes.</p> <p>19 BY MS. LEVINE-GRONNINGSATER:</p> <p>20 Q. How would it advantage Mr. Boyce?</p> <p>21 A. Just to have his photos, and to -- to be able to</p> <p>22 use his name, or post pictures on your Instagram, adding</p> <p>23 Bruce Weber, it just makes the model look more</p> <p>24 expensive, let's say, or sought after.</p> <p>25 Q. Is the opportunity to discuss modeling with</p>

<p style="text-align: right;">Page 214</p> <p>1 Mr. Weber valuable or lucrative for a model?</p> <p>2 MS. WEINTRAUB: Objection, assuming facts not in</p> <p>3 evidence. Can you ask him first if he ever discussed --</p> <p>4 MR. ROTHSCCHILD: What's all this speaking</p> <p>5 objections? You can ask her questions.</p> <p>6 MS. WEINTRAUB: Are you representing them now?</p> <p>7 MR. ROTHSCCHILD: No.</p> <p>8 MS. WEINTRAUB: Are you representing Jason</p> <p>9 Boyce?</p> <p>10 MR. ROTHSCCHILD: I'm trying to get this over</p> <p>11 with. Just state your objection. What's all this</p> <p>12 talking about?</p> <p>13 MS. LEVINE-GRONNINGSATER: Do you want me to</p> <p>14 re-ask the question?</p> <p>15 THE WITNESS: Yes, please.</p> <p>16 BY MS. LEVINE-GRONNINGSATER:</p> <p>17 Q. Is the opportunity to discuss modeling with</p> <p>18 Mr. Weber valuable for a male model?</p> <p>19 A. Yes.</p> <p>20 Q. Can Mr. Weber break a career the same way he can</p> <p>21 make a career?</p> <p>22 A. Like in what context? Like, meaning can he stop</p> <p>23 models from getting jobs?</p> <p>24 Q. Could he -- could he -- could his influence help</p> <p>25 blacklist someone?</p>	<p style="text-align: right;">Page 216</p> <p>1</p> <p>2 EXAMINATION</p> <p>3 BY MR. LEBOWITZ:</p> <p>4 Q. Hi, I'm Soul and Jason Kanner's lawyer. My name</p> <p>5 is Marc Lebowitz.</p> <p>6 Can you pick up the exhibit that was LBDW 935</p> <p>7 through 979. It is the series of e-mails; correct?</p> <p>8 MR. ROTHSCCHILD: Is that No. 14?</p> <p>9 MR. LEBOWITZ: I don't know what number it is.</p> <p>10 THE WITNESS: This one?</p> <p>11 MR. ROTHSCCHILD: Yes, No. 14.</p> <p>12 MR. LEBOWITZ: Do you have your production in</p> <p>13 front of you, the documents you produced, did you bring</p> <p>14 copies of his production?</p> <p>15 MR. ROTHSCCHILD: No.</p> <p>16 MR. LEBOWITZ: Okay. And that includes the</p> <p>17 documents you produced yesterday, you don't have copies</p> <p>18 of those with you? Nothing?</p> <p>19 MR. ROTHSCCHILD: No. I mean, I think -- I mean,</p> <p>20 if you need something in particular, I can probably get</p> <p>21 it sent over.</p> <p>22 MR. LEBOWITZ: I'm just asking if you can give</p> <p>23 him a set of the documents.</p> <p>24 MR. ROTHSCCHILD: Yeah, no, I didn't bring</p> <p>25 anything.</p>
<p style="text-align: right;">Page 215</p> <p>1 A. I don't think so -- I've never seen that happen</p> <p>2 before. It would be awfully -- take up a lot of your</p> <p>3 energy to do that. So I'm going to say no.</p> <p>4 Q. So his reputation is for helping models, not</p> <p>5 harming their -- excuse me -- harming their careers?</p> <p>6 A. Yes.</p> <p>7 Q. Does a model on a photo shoot, whether it's a</p> <p>8 paid shoot or not, have a right not to be touched?</p> <p>9 A. Yes.</p> <p>10 MS. LEVINE-GRONNINGSATER: That's it for me for</p> <p>11 now. I'll turn it over to Mr. Kanner's attorney.</p> <p>12 THE WITNESS: Thank you.</p> <p>13 MS. LEVINE-GRONNINGSATER: Thank you.</p> <p>14 THE VIDEOGRAPHER: Pass the mic over.</p> <p>15 MR. LEBOWITZ: Good?</p> <p>16 THE VIDEOGRAPHER: Yep.</p> <p>17 MR. ROTHSCCHILD: Do -- do you need a break?</p> <p>18 THE WITNESS: No, let's go.</p> <p>19 MR. ETRA: Smart. Continuing to show that</p> <p>20 you're a smart witness.</p> <p>21 MS. LEVINE-GRONNINGSATER: Objection, sucking up</p> <p>22 to the witness. For the record, people laughed, it was</p> <p>23 a joke.</p> <p>24 MR. ETRA: I concur, it was a joke, and totally</p> <p>25 fair.</p>	<p style="text-align: right;">Page 217</p> <p>1 BY MR. LEBOWITZ:</p> <p>2 Q. Okay. So we had some discussion before on the</p> <p>3 record about the series of text messages between you and</p> <p>4 Bruce Weber between February 15th, 2013 and July 21st,</p> <p>5 2017.</p> <p>6 Do you recall that discussion?</p> <p>7 A. About Jason Boyce?</p> <p>8 Q. Just about this series of text messages. Just</p> <p>9 have a look at them. Skim through it.</p> <p>10 A. Do I recall texting with Bruce Weber?</p> <p>11 Q. No, do you recall the discussion here, earlier,</p> <p>12 about these text messages?</p> <p>13 A. What was it?</p> <p>14 Q. Then, no. Okay, we'll go back through it.</p> <p>15 Take a look at these -- skim through this, if</p> <p>16 you would, all of the pages.</p> <p>17 A. Uh-huh.</p> <p>18 MR. ROTHSCCHILD: Well, is there a specific --</p> <p>19 THE WITNESS: Yeah, what's the question?</p> <p>20 MR. ROTHSCCHILD: Why don't you ask him -- I</p> <p>21 mean, is there a specific one you want to ask about?</p> <p>22 Because he has skimmed through them.</p> <p>23 BY MR. LEBOWITZ:</p> <p>24 Q. Okay. So these are all your text messages to</p> <p>25 Bruce; right? And you didn't produce any of these;</p>

DAVID TODD

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